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## **Report of the Director of City Development**

**Report to: Development Plan Panel** 

Date: 26<sup>th</sup> September 2012

Subject: LDF Core Strategy - Publication Draft, Analysis of Consultation

Responses: Spatial Policy 10: Green Belt

Are specific electoral Wards affected?  If relevant, name(s) of Ward(s):	☐ Yes	⊠ No
Are there implications for equality and diversity and cohesion and integration?	☐ Yes	⊠ No
Is the decision eligible for Call-In?	☐ Yes	⊠ No
Does the report contain confidential or exempt information?  If relevant, Access to Information Procedure Rule number:  Appendix number:	☐ Yes	⊠ No

# Summary of main issues

1. The key issues which have arisen in response to this part of the Core Strategy include comments in relation to the overall scope of the Green Belt review (some support/concerns regarding the review) and the need for the approach to be clarified. A number of comments have also been raised regarding detailed Policy wording and the need to consider proposals outside the Settlement Hierarchy. A number of issues have been raised also regarding the approach to Protected Area of Search and the need for this to be clarified.

#### Recommendations

Development Plan Panel is requested to:

i). note and comment on the contents of the report and the course of further action (as detailed in Appendix 1 to the report).

#### 1.0 Purpose of this Report

1.1 Within the context of the Core Strategy Initial Report of Consultation (6<sup>th</sup> June), the purpose of this report is to review consultation responses in relation to Spatial Policy 10. Appendix 1 attached, summarises the representors, key issues raised, the City Council's view and proposed action. Appendix 2, details wording changes to the Core Strategy text, where changes are considered necessary, in response to representations received.

## 2.0 Background Information

- 2.1 Following Consideration by the Development Plan Panel and Executive Board, a 6 week period of public consultation has been undertaken, commencing on 28<sup>th</sup> February to 12<sup>th</sup> April 2012. Consistent with the LDF regulations, this is a targeted stage of consultation, with emphasis upon requesting responses in relation to the "soundness" of the plan. Within this context, the consultation material comprised of a range of documents, which were subsequently made available on line or as paper copies, including:
  - Core Strategy Publication Draft (Main Document)
  - Sustainability Appraisal (& Non Technical Summary)
  - Habitats Regulations Assessment Screening
  - Equality Impact Assessment Screening
  - Draft Infrastructure Delivery Plan
  - Draft Core Strategy Monitoring Framework
  - Health Topic Paper
  - Report of Consultation on Preferred Approach (October December 2009)

Links were also incorporated to the consultation web pages to the evidence based material, which has been prepared to help inform the emerging document (including the Employment Land Review, Leeds City Centre, Town and Local Centres Study, Housing Growth in Leeds, Strategic Housing Land Availability Assessment, Strategic Housing Market Assessment and the Leeds open space, sport and recreation assessment.

#### 3.0 Main Issues

3.1 The key issues which have arisen in response to this part of the Core Strategy include comments in relation to the overall scope of the Green Belt review (some support/concerns regarding the review) and the need for the approach to be clarified. A number of comments have also been raised regarding detailed Policy wording and the need to consider proposals outside the settlement hierarchy. A number of issues have been raised also regarding the approach to Protected Area of Search and the need for this to be clarified.

#### 4.0 Corporate Considerations

As noted above, the Core Strategy, forms part of the Local Development Framework and once adopted will form part of the Development Plan for Leeds.

#### 4.1 Consultation and Engagement

4.1.1 As outlined in this report, the Core Strategy Publication draft has been subject to a further 6 week period of consultation. This has been undertaken in accordance with the LDF Regulations and the City Council's adopted Statement of Community Involvement (SCI).

# 4.2 Equality and Diversity / Cohesion and Integration

4.2.1 An Equality Impact Assessment Screening was undertaken on the Core Strategy Publication draft, prior to consultation (see Core Strategy Executive Board Report, 10<sup>th</sup> February 2012). This concluded that equality, diversity, cohesion and integration issues had been embedded as part of the plan's preparation. For information and comment, the Screening assessment has also been made available as part of the supporting material for the Publication draft consultation. Within this overall context, it will be necessary to continue to have regard to equality and diversity issues, as part of the ongoing process of preparing the Core Strategy, including considering representations and next steps.

# 4.3 Council Policies and City Priorities

4.3.1 The Core Strategy, plays 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 meeting a host of social, environmental and economic objectives, where relevant the Core Strategy also seeks to support and advance the implementation of a range of other key City Council and wider partnership documents. These include the Leeds Growth Strategy, the City Priority Plan, the Council Business Plan and the desire to be a 'child friendly city'.

#### 4.4 Resources and value for money

4.4.1 The DPD is being prepared within the context of the LDF Regulations, statutory requirements and within existing resources.

# 4.5 Legal Implications, Access to Information and Call In

4.5.1 The DPD is being prepared within the context of the LDF Regulations and statutory requirements. The DPD is a Budgetary and Policy Framework document and as such this report is exempt from call-in by Scrutiny.

#### 4.6 Risk Management

4.6.1 The Core Strategy is being prepared within the context of the LDF Regulations and the need to reflect national planning guidance. The preparation of the plan within the context of ongoing national reform to the planning system and in responding to local issues and priorities, is a challenging process. Consequently, at the appropriate time advice is sought from a number of sources, including legal advice and advice from the Planning Advisory Service and the Planning Inspectorate, as a basis to help manage risk and to keep the process moving forward.

#### 5. Conclusions

5.1 This report provides an overview of the issues raised in relation to Policy SP10 of the Publication Draft Core Strategy. Within this context, minor policy wording changes are proposed to update the Policy in relation to the NPPF and to reflect potential of sites, outside settlements (where exceptionally and within the context of Housing Market Characteristic Areas), it can be demonstrated that sites are in sustainable locations and are able to meet the full range of local facilities and services.

#### 6. Recommendations

- 6.1 Development Plan Panel is requested to:
  - i). note and comment on the contents of the report and the course of further action (as detailed in Appendix 1 to the report).

# 7. Background documents<sup>1</sup>

7.1 A substantial number of documents are available representing various stages in preparation of the DPD and the background evidence base and Equalities Impact Assessment Screening. These are all available on the City Council's web site (LDF Core Strategy Pages) web pages or by contacting David Feeney on 247 4539.

<sup>&</sup>lt;sup>1</sup> The background documents listed in this section are available for inspection on request for a period of four years following the date of the relevant meeting. Accordingly this list does not include documents containing exempt or confidential information, or any published works. Requests to inspect any background documents should be submitted to the report author.

# Appendix 1:

# **Core Strategy Publication Draft - Analysis of Consultation Responses**

# **SPATIAL POLICY 10: GREEN BELT**

Representor/Agent	Representor Comments	LCC Initial Response	Action
(0420) Caddick Developments (via White Young Green Planning	Support selective review of GB. Given that Table 2 recognises that 19, 400 new homes are to be provided as extensions to settlements, then the need for a GB review is fundamental at an early stage in order to accommodate the scale of housing identified in SP6	Support welcomed	No change.
(2663) Miller Strategic Land (via Spawforths (2663) Spawforths	Supports the need to undertake a Green Belt review to deliver the development needed in the District over the Plan period.	Support welcomed	No change.
(5867) C/o Hileys Solicitors (via LDP Planning)	Support for Green Belt review as considered essential to meet housing and employment needs. Particularly important for major and small settlements so can expand to deliver urban extensions. SP10 suitable basis to undertake the review but need to strengthen consideration presumption in favour of sustainable development, in undertaking the review.	Support welcomed	No change.
(0057) Hallam Land Management Ltd (via Barton Willmore Planning Partnership- Northern)	Support for the approach to Protected Areas of Search Land (Paras. 4.8.6 – 4.8.7) and puts forward sites at Rothwell & Oulton, regarded as suitable.  Support for selective Green Belt Review and use of criteria (iv – SP10), which is considered to be consistent with the NPPF.	Support welcomed	No change.
(0057) Ashdale Land and Property Company Ltd (via Barton Willmore Planning Partnership-	Support for the approach to Protected Areas of Search Land (Paras. 4.8.6 – 4.8.7) and puts forward sites at Micklefield & Kippax regarded as suitable.	Support welcomed  Sites at Micklefield and Kippax noted. It is not the focus of the Core Strategy to consider individual sites/proposals. This	Support welcomed

Northern)	Support for selective Green Belt Review and use of criteria (iv – SP10), which is	is a matter for consideration as part of the preparation of the Site Allocations DPD.	
(0057) Templegate Developments (via Barton Willmore Planning Partnership- Northern)	considered to be consistent with the NPPF.  Support for selective Green Belt Review and use of criteria (iv – SP10), which is considered to be consistent with the NPPF and puts forward land adjacent to Skelton Gate, regarded as suitable for development.	Support welcomed.  Site at Skelton Gate noted. It is not the focus of the Core Strategy to consider individual sites/proposals. This is a matter for consideration as part of the preparation of the Site Allocations DPD.	No change.
(4388) Pegasus Planning Group	Support for Policy which clearly sets out where Green Belt review will be necessary in order to meet identified needs and deliver growth sustainably.  View that Green Belt review around Garforth is necessary to meet identified need.  Support for the identification of additional Protected Areas of Search land to meet growth beyond 2028 but this should be over and above that required to meet the housing target, not part of the anticipated supply.	Support welcomed.  Points regarding Garforth are noted. It is not the focus of the Core Strategy to consider individual sites/proposals. This is a matter for consideration as part of the preparation of the Site Allocations DPD.	No change.
(0420) Leeds Trinity University College (via White Young Green Planning)	Support the proposed selective review of the Green Belt detailed in Spatial Policy 10, which will include a review of the Green Belt around Horsforth which falls within the Main Urban Area. However, the policy needs to be amended to state that the selective review will also consider Green Belt release at existing education institutions where sites are currently constrained by Green Belt.	Support welcomed.  The focus of the Policy (within the context of the Core Strategy as a whole), is for a selective review, associated with housing and employment growth issues. It is not considered appropriate at this time to consider a Green Belt review on the basis of individual education establishments.	No change.
(5666) Brownberrie Farm (via J & J Design)	Supports for the selective review of the Green Belt but considers the purposes of the review should be expanded to include community facilities including education provision.	Support welcomed. The focus of the Policy (within the context of the Core Strategy as a whole), is for a selective review, associated with housing and employment growth issues. It is not considered appropriate at this time to consider a Green Belt review on the basis of community	No change.

		facilities/education establishments.	
(0420) Leeds Bradford International Airport (via White Young Green Planning)	The Policy outlines in broad terms the areas in which a selective review of the Green Belt may be necessary in order to accommodate future employment and housing needs. The airport is currently washed over by Green Belt, which is considered to be inconsistent with the future development of the airport, and the purposes of Green Belt set out in PPG2. The potential to review the Green Belt at LBIA should therefore be acknowledged in the Policy.	The Airport has a key role to play as part of the District's strategic infrastructure and as an employer. However, It is not clear why a Green Belt review of land in relation to the Airport is necessary. Existing allocations are in place (yet to be fully taken up) and the extent of the operational land boundary at the Airport, allows scope for growth.  Further consideration of planning issues at the Airport, will need to be taken into account, as part of the development of the emerging Airport Master Plan.	No change.
(5681) Lady Elizabeth Hastings Estate Charity, The Diocese of Ripon and Leeds, The Hatfield Estate, Meadowside Holdings Ltd, The Ledston Estate, AR Briggs and Co, Bramham Park Estate (via Carter Jonas)	Support need to undertake a Green Belt review and that that Protected Areas of Search (PAS land) will be identified through this Review to provide a contingency for growth should the supply of allocations prove insufficient.  Support for the statement that the Site Allocations DPD will provide the detailed mechanism for such a review.  Concern that there is no reference to a review of Green Belt boundaries to ensure that they remain robust where the character of the Green Belt has changed as a result of individual or cumulative development proposals or land use changes, or where the land is no longer considered to contribute to Green Belt purposes.  Clarification is needed that there is no intention to increase the extent of the Green Belt within the District would be appropriate for example to the north and east of the River Wharfe at Thorp Arch.	Support welcomed.  The scope of SP10 is to set out the requirements for a selective Green Belt review, to be undertaken as an integral part of the preparation of the Site Allocations DPD. Detailed boundary issues will be considered at this time, in relation to the assessment of individual sites, as a basis to make allocations.  The 'Rural Land' designation, situated to the NE of the district, will continue to be retained as a UDP saved policy.	No change.
(5884) McGregor	Support for Selective Green Belt Review,	Support welcomed.	No change.
Brothers Ltd (via West	as necessary to support housing growth.		

Waddy ADP)			
	Commitment to review Green Belt around the smaller settlements (listed in Table 1, which includes East Ardsley), is particularly welcomed.	Point regarding East Ardsley is noted. It is not the focus of the Core Strategy to consider individual sites/proposals. This is a matter for consideration as part of the preparation of the Site Allocations DPD.	
(1091) Quod (via Land Securities & Evans of Leeds	The Policy will need to be updated to reflect the NPPF, and in particular the criteria for the review of the Green Belt should be consistent with paragraph 85 of the NPPF.	SP10 (iv), will need to be updated to delete reference to PPG2 and to the 'Draft' NPPF. The remainder of the Policy is considered to be consistent with the NPPF.	Change:  Delete the words 'PPG2' & 'Draft' from (iv):  (iv) 'identified in national guidance (PPG2/Draft National Planning Policy Framework)'.
(0062) Leeds Civic Trust	Concern that the drafting of the policy implies that Green Belt can be altered to suit the needs of development, rather than have regard to longer term permanence. It is suggested that the policy should be amended to list the purposes of Green Belt, not the need for development land. Land removed from Green Belt should also be the lowest priority for development.	As set out in the Policy wording, a selective review of the Green Belt is considered necessary to accommodate the scale of housing and employment growth set out in the plan. This is a legitimate planning reason for the review and does not imply that a revised Green Belt boundary will not have longer term permanence. It is not considered necessary to list the purposes of Green Belt in the Policy wording, as cross reference to the NPPF is made in (iv). The selective Green Belt review will be undertaken as part of the preparation of the Site Allocations DPD and individual sites will be assessed on their merits against sustainability and Green Belt criteria	No change.
(0942) Mr Anthony L Silson	Release of greenfield and Green Belt land is unsound as fewer dwellings are needed than forecast, developers will prefer to build on the green sites first negating the policy of prioritising brownfield sites, the priority to development of green sites near settlements is contradictory as the very places where Green Belt/fields are essential are close to settlements, 4. it is contradictory to identify Green Belt land as protected but then release some for development. All Green Belt, Greenfield and Green Infrastructure needs therefore to be retained,	The concerns are noted. However, on the basis of the Core Strategy evidence base, Leeds does need to plan for population growth and housing need. Within the context of the Spatial Vision and overall policy framework, the Core Strategy does seek to give emphasis to the use of brownfield land, as a focus for growth and regeneration. The plan also gives prominence to the importance of local character and distinctiveness as well as the role of Green Infrastructure (SP 13 and G1), in planning for growth.	No change.

(1930) Lawrence Walker	The Guiseley, Yeadon, Rawdon and Otley areas should be removed from proposed selective review of Green Belt, considering the location of Guiseley/Yeadon/Rawdon as outer Leeds areas, and in the interests of retaining the balance of their rural and urban characteristics.	As set out in the Core Strategy document, a key component of the plan is to deliver longer term regeneration and growth via the Settlement Hierarchy. Within this context, Guiseley, Yeadon, Rawdon and Otley, are included as Major Settlements. Policy SP10, sets out the scope of the review in relation to the Settlement Hierarchy, including Major Settlements. Consequently, the review of Green Belt in these locations is consistent with the overall strategy.	No change.
	A sequential approach to identifying sites for development has not been carried out  The amenity of residents within these areas would be significantly compromised if parts of the surrounding Green Belt were to be released. The Chevin area of Otley and Billing area of Rawdon should be specifically protected. The plan is unsound due to the lack of demonstrable demand for new housing. View that the plan is withdrawn from the examination timetable and amended to reflect comments.	The identification of individual sites, consistent with the overall approach of the Core Strategy, will be undertaken as part of the preparation of the Site Allocations DPD. Within this context, individual sites will be assessed against sustainability and Green Belt criteria.  Based on the Core Strategy evidence base, the City Council does need to plan for housing growth, it is not therefore accepted that the plan is unsound and should be withdrawn.	
(5869) Briony Spandler	Concern that Green Belt development is short sighted and not imaginative way to address housing needs, an alternative solution is needed.  Land identified in Rawdon as Green Belt has been identified for good reason.	The concerns are noted but the Core Strategy is seeking to maximise the potential of opportunities within urban areas to contribute towards housing growth. Based upon the evidence base, a selective Green Belt review is however required to plan for longer term population growth and housing needs.	No change.
(5875) Dr Jonathan Davies	Concerns relate to the intended removal of Green Belt status from the area including and surrounding Rawdon Billing.  The area one of outstanding natural beauty with a rich diversity of woodland, scrub and water all of which nurture a significant biodiversity, it is an area of land which is used by the local community.  Proposed development would put an	The concerns are noted. The consideration of individual sites and infrastructure requirements, will be considered as part of the Site Allocations DPD, consistent with the overall approach of the Core Strategy. In planning for District wide infrastructure requirements, the Core Strategy is supported by an Infrastructure Delivery Plan and the City Council is also in the process of developing a Community Infrastructure Levy, as a basis to secure funding, arising from development proposals.	No change.

	intolerable strain on the infrastructure of the local area (including increased traffic congestion, increased demand for schooling at facilities that are already at capacity, increased demand for NHS services).		
(5871) Mr Tony Blackmore	The selective review of Green Belt release is not in accordance with the NPPF, which states Green Belt should only be used in exceptional circumstances, this should be reflected in the Core Strategy.	Policy SP10, sets out the scope of the selective review, which is considered to be consistent with the approach of the Core Strategy and the overall approach of the NPPF.	No change.
(5913) Mr Keith Sharkey	Concern that the Core Strategy is unsound on the basis of need to maximise brownfield sites as a priority over greenfield, insufficient consideration has been given to existing under occupied housing stock (public & private).  Policy SP10 needs to be amended (iv), to	The concerns are noted but the Core Strategy is seeking to maximise the potential of opportunities within urban areas to contribute towards housing growth. The City Council, is continuing to work with a range of partners, to deliver a range of initiatives to make best use of the existing housing stock.  Leisure and tourism within the Green Belt are covered by	No change.
	include assessment against tourism and leisure activity.	existing UDP saved policies and as part of the general provisions of the NPPF, it is not therefore considered appropriate for them to be duplicated within SP10.	
(4783) Mr Cedric Wilks	Need for coordination of the implications of the Localism Act, to avoid disagreements and inconsistencies.	The City Council is actively supporting the provisions of the Localism Act (through Neighbourhood Planning and Duty to Cooperate arrangements) and will need to consider any implications for Green Belt which may arise, in planning positively for Leeds.	No change.
(0045) Alwoodley Parish Council	The Parish Council is concerned that the Strategy allows for some use of the Green Belt but is not site specific.	The concerns are noted but the Core Strategy is seeking to maximise the potential of opportunities within urban areas to contribute towards housing growth, whilst recognising the needs for a selective Green Belt review (reflecting the evidence base). It is not the purpose of the Core Strategy to identify individual sites, this is the role of the Site Allocations DPD.	No change.

(0065) Oulton Civic Society	Concern that the Policy is unsound & Para. 4.8.4 needs to be amended to make reference to 'in very exceptional circumstances'.	Policy SP10, is set within the overall context of the Spatial Vision of the Core Strategy and national guidance. Based upon the evidence base, Leeds needs to plan for urban regeneration and growth. Whilst seeking to secure the delivery of previously developed land within the urban area, a selective Green Belt review is also necessary, within an overall approach which is considered to be sound.	No change.
	Concern of the impact of the selective Green Belt review upon Rothwell and Oulton re. Special Landscape Areas, Green Infrastructure and the potential to 'narrow the gap' between Leeds and Wakefield (especially given development proposals within Wakefield MDC - Site Specific Proposals propose to release 57 hectares as a Freight and Distribution Centre alongside a planning application to release 89 hectares for a mixed use development).	Concerns regarding Rothwell are noted and the relationship to proposals within Wakefield MDC. However, It is not the purpose of the Core Strategy to identify individual sites, this is the role of the Site Allocations DPD, where detailed site assessments will be made.	
	Support for contingency to identify new areas of Protected Areas of Search but consider references to existing PAS as 'one of the prime sources of housing allocations in the LDF' to be unsound. New PAS sites need to be assessed against existing PAS sites for sustainability.	General support for approach to Protected Areas of Search welcomed. The reference in the Core Strategy to the role of existing PAS sites, is a reflection of the status of the sites which have been established through the UDP and the fact that these have been set aside for longer term development needs. The sustainability merits of all sites to be considered through the Site Allocations process will need to be taken into account.	No change.
(0106) Aberford Parish Council	The NPPF states that new Green Belt (s) should only be established in exceptional circumstances i.e. new settlements and major urban extensions, does this mean that the use of Green Belt for other purposes – i.e. smaller scale development in the Outer North East Area should be dismissed?	The scope of the Core Strategy selective review is set out in Policy SP10 and relates to the delivery of the housing requirement and distribution (set out in Policies SP6 & SP7) and is linked to the Settlement Hierarchy. This also takes into account opportunities linked to Smaller Settlements and other settlements, subject to the provision of local facilities and consistency with the Core Strategy.	No change.
(0111) Barwick in Elmet & Scholes Parish Council, (5874) Barwick-in-	Have been advised by Dept of Communities & Local Government (DCLG) that Green Belt review should be determined by communities through	There appears to be a misunderstanding on this point. Neighbourhood Plans need to be in conformity with the Development Plan (i.e. the Core Strategy and Site Allocations DPD). Neighbourhood Plans provide scope for	No change.

Elmet & Scholes Nhood DevPlan Steering, (0112) Boston Spa Parish Council	Neighbourhood Development Plans but consider that the Core Strategy should establish permanent Green Belt boundaries, which should be reflected in revisions to SP10 (including the deletion of the word "Exceptional"). Policy in current form will be open to legal challenge.	development proposals to reflect this conformity and for higher levels of development. Policy SP10 as drafted, allows for some flexibility in considering such proposals as they emerge and is considered to reflect national guidance as set out in the NPPF.	
	Locations identified as Protected Areas of Search will be the subject of a sustainability appraisal and recognise any constraints which may arise from communities adopted or emerging "Neighbourhood Development Plans".	Sites identified as part of the Site Allocations DPD process will need to be subject to sustainability appraisal, as will Neighbourhood Plans.	
(5879) Mr Martin Fox	Concern regarding the impact of Green Belt review upon Berwick, Open views to countryside is a key feature of the village; therefore the Green Belt needs to be preserved.  Concern that the selective Green Belt review, contravenes Localism Act and advice from local MP.	Concern regarding the impact of Green Belt review is noted. A key aspect of the Core Strategy is to respect local character and distinctiveness, whilst planning for longer term regeneration and growth. Any site allocations for Berwick will be subject to individual assessment against sustainability and Green Belt criteria. The overall approach of the Core Strategy (and selective Green Belt review), is considered to be consistent with national planning guidance and the Localism Act.	No change.
(0122) Micklefield Parish Council	Considered that the Policy is unsound because it does not expressly state that the selective review of the Green Belt will consider sub clauses (I). (ii) & (iii) in that order of priority. Spatial Policy 10 is also fundamentally flawed because no strategy is articulated in the policy itself as to how many hectares of new PAS Land designations are needed.  There is no attempt to broadly outline where extensions to the Main Urban Area (MAU) should be expected (neither in the policy, nor in the accompanying Key Diagram. Concern that as a result, the Site Allocations DPD will be a free-for-all.	Spatial Policy 7 Table. 2, gives an indication of the broad housing distribution by Settlement Hierarchy. For each level of the Settlement Hierarchy, the Table sets out the number of anticipated dwellings by number and as a percentage, whilst also identifying if this will be delivered as an "Infill" or as an "Extension". Within this context, sites will need to be identified through the Site Allocation DPD process, consistent with this overall approach and with regard to Policy SP10. As set out in paras. 4.8.6 – 4.8.7, the Core Strategy, consideration will also need to be made to the identification of Protected Areas of Search. The precise location of such areas will need to be considered as part of the preparation of the Site Allocations DPD and at this stage it is anticipated that this should account for at least 10% of the total land identified for housing. This overall approach is considered to be reasonable and realistic but will need to be subject to review through the Site Allocations process.	No change.

	overarching guidance at a local (i.e. Leeds) level to identify where there is a need for additional PAS Land, or where the balance is to be struck across the district.  Concern that the northern quadrant of the MAU from Horsforth round to Scarcroft appears to play no quantifiable part in the new housing allocations in Spatial Policy 6 and there is nothing in Spatial Policy 10 to indicate that the northern quadrant will even have a part to play in the designation of additional PAS Land in the oppure that	As noted above, Table 2 in Policy SP7 sets out the broad quantum and distribution of housing allocations District-wide. Table 3 of SP7 also sets out housing distribution and a quantum and percentage District wide, by Housing Market Characteristic Area.	No change.
	of additional PAS Land, i.e. to ensure that the boundary of the Green Belt has permanence well beyond the end of the Plan Period (2028).  The Policy therefore needs to be significantly revised in order to guide the selective review, identify how much land is needed and where in relation to the settlement hierarchy – prioritised by settlement size. This growth needs to be balanced across the district and have regard to community need, market need and locational capacity.		
(0136) Drighlington Parish Council	Considers that the number of outstanding planning permissions for housing together with the low levels of building and further scope for finding brownfield land means that there is no practical need for the release of large amounts of greenfield or greenbelt land for development.	Policy SP10, is set within the overall context of the Spatial Vision of the Core Strategy and national guidance. Based upon the evidence base, Leeds needs to plan for urban regeneration and growth. This overall approach takes into account existing planning permissions and the availability of brownfield land. Within this context, whilst seeking to secure the delivery of previously developed land within the urban area, a selective Green Belt review is also necessary.	No change.
	Green Belt in 'Outer South West Leeds' often is reduced already to narrow and fragile strips which are vital to the prevention of coalescence of settlements. Any loss of greenbelt in this area would be harmful to the structure of West Yorkshire	Concerns regarding the extent of current Green Belt are noted. A key aspect of the Core Strategy is to respect local character and distinctiveness, whilst planning for longer term regeneration and growth. Any site allocations within the 'Outer South West', will be subject to individual assessment against sustainability and Green Belt criteria.	

	and it would undermine the openness and separation which maintain district communities in green settings.		
(4825) Morley Town Council	Concern that Green Belt may be released for employment. This should be resisted strongly: there are many acres of late 1950s to early 1980s sub-standard big sheds in Leeds which might be cleared.  Potential windfall generation of brownfield land for employment use should be calculated; without this Core Strategy would be unsound as it might endanger Green Belt unnecessarily.	Concerns regarding unnecessary Green Belt release is noted. A key strand of the Core Strategy is to make best use of land within urban areas, including employment. However, in order to support longer term economic growth and to provide opportunities for local job creation, the Core Strategy acknowledges, that employment allocation may need to be made in association with locations identified for housing growth, as a basis to ensure the integrated planning and sustainability of new communities.	No change
	Need to recalculate housing land need following publication of NPPF and questions about population growth and economic capacity to pay for large numbers of new dwellings.	It is not clear what specific impact the NPPF has upon the housing land calculations made in support of the Core Strategy. Within this context, the NPPF offers encouragement to PDL as a component of housing land supply, which is supporting of the City Council's position. Further details of the City Council's consideration of responses raised regarding housing calculations is covered in the analysis report to SP6.	No change
	Need to re-instate "brownfield first" as the City Council's flagship development land policy.	As set out on the Spatial Vision and Objectives of the Core Strategy (and a range of Policies including SP1 & H1), the plan seeks to give a preference for the use of brownfield land, consistent with the overall approach of the NPPF.	No change.
	Green Belt is vital in maintaining separation and distinctiveness of settlements, not just in Leeds, but, throughout West Yorkshire (this is particularly so in the conurbation core of which Morley is a part).	A key aspect of the Core Strategy is to respect local character and distinctiveness, whilst planning for longer term regeneration and growth. Any site allocations within the Morley area, will be subject to individual assessment against sustainability and Green Belt criteria.	No change
	Need to work closely with neighbouring authorities, otherwise the Core Strategy is unsound.	This point is noted and is reflect in proposed changes to the Introductory section of the Core Strategy.	See changes proposed to Introduction/'Spatial Vision'.

	UDP Protected Area of Search (PAS) allocations were extensive, in part because the UDP Inspector based calculations of housing land need on an average density of 25 dwellings to the hectare, or ten to the acre, far less dense than current in the 1990s or at any trine since. Careful and realistic management of land allocation could see much UDP PAS land carried forward into the LDF.	PAS sites will be reviewed alongside other sites via the preparation of the Site Allocations DPD, in order to make the best use of allocations/sites, consistent with the overall approach of the Core Strategy.	No change.
(5863) Mr Michael Green	Concern that the housing target for Outer South West's target is greater numerically and proportionately than any of the other non-priority areas. Concern that the only way of achieving this level of development would be significant extension of Morley itself which would lead to merging of Morley with the Main Urban Area (via the release of Green Belt).	Concerns are noted. A key aspect of the Core Strategy is to respect local character and distinctiveness, whilst planning for longer term regeneration and growth. Any site allocations within the Morley area, will be subject to individual assessment against sustainability and Green Belt criteria.	No change.
(5885) Mrs Lisa Jackson	View that population growth forecasts for Leeds are speculative, low levels of building and brownfield capacity, mean that greenfield/Green Belt release is not warranted. Concern re. housing requirement in Outer South West and impact upon local character and coalescence of settlements through Green Belt release. Concern re. scale of development upon local infrastructure capacity (schools, roads, drainage etc).	Policy SP10, is set within the overall context of the Spatial Vision of the Core Strategy and national guidance. Based upon the evidence base (including population forecasts), Leeds needs to plan for urban regeneration and growth. This overall approach takes into account existing planning permissions and the availability of brownfield land. Within this context, whilst seeking to secure the delivery of previously developed land within the urban area, a selective Green Belt review is also necessary. An Infrastructure Delivery Plan has been prepared as part of the Core Strategy and more detailed local assessment will be undertaken as part of the preparation of the Site Allocations DPD.	No change.
(0092) Home Builders Federation	Support in principle for a Green Belt review but the Policy is considered to be unsound as a Green Belt review should be completed prior to the submission of the Core Strategy to inform the spatial strategy.  The policy is also considered to be unsound also, as it is very unclear when the Green Belt review will be completed	General support welcomed.  The approach of the Core Strategy is consistent with NPPF. The Core Strategy and emerging Site Allocations DPD, form part of the 'local plan' for Leeds, with the Core Strategy setting the strategic context for the site allocations. It is not necessary for the Green Belt review to be conducted in advance of the submission of the Core Strategy.	No change.

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	even though development on former Green Belt sites will be necessary to deliver the housing strategy.	The Core Strategy emphasises the need for early progress to be made with the preparation of the Site Allocations DPD. A scoping report for the preparation of the Site Allocations DPD has been agreed by the City Council's Executive Board and it is envisaged that consultation on Issues and Options will take place in early 2013, consistent with the agreed programme and timetable.	
(0420) Cornforth & Sons (via White Young Green Planning).	Support for SP 10 in principle.  Support for the definition of Bardsey as a Smaller Settlement (Table 1 - Identification of Settlement Types). Within this context, Policy SP 10 should be amended to recognise that Green Belt releases are not solely about the tests previously stipulated within PPG2 but about delivering sustainable sites. Spatial Policy 10: Green Belt although supported in principle is not acceptable in its current form. It is considered that it is not acceptable to determine if Green Belt sites should be allocated by criteria (iv) (National Guidance) and (v) (Saved UDP Policies and emerging guidance) as sustainable locations are not defined in criteria (i) – (iii). By exception only the determination on whether a site in other settlements should be released from the Green Belt should be clarified, the determination criteria does not advise whether sustainability or Green Belt	Support welcomed.  The approach set out as part of Policy SP10, is considered to be consistent with national guidance. As with the NPPF, the policy framework of the Core Strategy needs to be read as a whole. Within this context Policy SP1 sets out the broad locational criteria and the Spatial Vision and Objectives, set out the broad sustainability criteria for development. In additional, sites to be considered as part of the Site Allocations process, will be subject to assessment against sustainability and Green Belt criteria.	No change.
(0420) D Westwood & Son (via White Young Green Planning)	comes first.  Support for undertaking a selective review at an early stage, but considers that the policy should be reworked to make clear that Green Belt release will be considered in suitable locations in villages and other rural settlements as well as the areas identified in points (i)-(ii) to ensure that Green Belt release is delivered in the most sustainable locations.	Support welcomed.  The Policy text following (iii) recognises that in 'exceptional cases', sites in other settlements could be considered, where they are in sustainable locations.	No change.

(5034) Evans Homes No. 2 Ltd (via Drivers Jonas Deloitte)	Support need for Green Belt review, a full review should be undertaken in tandem with the production of the Core Strategy. This will allow policies to be informed by it, and would be consistent with the NPPF (para 83). Support to the recognition to major settlement of Wetherby as an area where a Green Belt review would generally be considered.	Support welcomed.  The approach of the Core Strategy is consistent with NPPF. The Core Strategy and emerging Site Allocations DPD, form part of the 'local plan' for Leeds, with the Core Strategy setting the strategic context for the site allocations. It is not necessary for the Green Belt review to be conducted in advance of the submission of the Core Strategy. A selective review can be justified on the basis of the strategic approach to locating growth, consistent with the Settlement Hierarchy and the scale and broad distribution of housing growth which is being planned for.	No change.
(0466) Savills	Support for Green Belt Review and the need to create additional Protected Areas of Search but concern it will only be a 'selective review'. Government advice contained in the NPPF advises that boundaries should endure and that they should not need to be altered at the end of the plan period. The Policy should therefore be changed to specify that a full review should be undertaken.  The Policy also needs to be revised to be clearer on how to treat villages (Thorner) within the Green Belt. Villages should only be incorporated in the Green Belt if their open character contributes towards the wider openness of the Green Belt. Within this context Thorner needs to be removed from the Green Belt.	Support welcomed.  The approach of the Core Strategy is consistent with NPPF. The Core Strategy and emerging Site Allocations DPD, form part of the 'local plan' for Leeds, with the Core Strategy setting the strategic context for the site allocations. It is not necessary for the Green Belt review to be conducted in advance of the submission of the Core Strategy. A selective review can be justified on the basis of the strategic approach to locating growth, consistent with the Settlement Hierarchy and the scale and broad distribution of housing growth which is being planned for.  The approach of the Core Strategy is clear with regard to villages/rural (as set out in the Settlement Hierarchy). Within this context, the Policy as worded, allows some scope for development within 'other settlements' subject to exceptions and sustainability considerations.	No change.
(5105) Renew	Need to consider need for additional criteria re. small settlements, "to assist and ensure the continuance of local amenities in smaller settlements that selective housing development could bring".	Point noted but development in all settlements, will be expected to make the necessary contributions, consistent with the overall approach of the plan.	No change.
(5039) Signet Planning	Support for Policy and (in hierarchical terms), release around the 'smaller settlements' should be the last resort.	Support welcomed.	No change.

	The need to identify additional PAS land is also supported, although this does not necessarily need to be at the cost of Green Belt and could be on other land outside of current development limits.  The Green Belt review should be undertaken alongside the preparation of the Allocations DPD to ensure unnecessary release is avoided.  Paragraph 4.8.6 recognises the need to identify land for unidentified needs (PAS land). Whilst PAS land is already identified within the existing UDP, it needs to be considered that additional PAS land should be identified for the forthcoming plan period to provide a safety net should there be a change in circumstances.	The approach of the Core Strategy is consistent with NPPF. The Core Strategy and emerging Site Allocations DPD, form part of the 'local plan' for Leeds, with the Core Strategy setting the strategic context for the site allocations. It is not necessary for the Green Belt review to be conducted in advance of the submission of the Core Strategy. The Core Strategy recognises the importance of PAS in contributing towards longer term development requirements.	No change.  No change.
(0480) Warner, Redrow, Taylor Wimpey, Mirfield, Keyland, Barratt Leeds, Kebbell, Barrett York, Chatford Miller and	Support in principle for the selective review and the identification of new Protected Areas of Search, concern that the lack of detail and timing of the review.	Support welcomed.	No change.
Ashdale (via Dacre Son & Hartley)	The proposed amount of PAS land to be identified of at least 10% is not justified and it is considered this is not the most appropriate strategy when considered against the reasonable alternatives.	As set out in paras. 4.8.6 – 4.8.7, the Core Strategy, consideration will also need to be made to the identification of Protected Areas of Search. The precise location of such areas will need to be considered as part of the preparation of the Site Allocations DPD and at this stage it is anticipated that this should account for at least 10% of the total land identified for housing. This overall approach is considered to be reasonable and realistic and will be subject to review through the Site Allocations process.	No change.
(1186) T G M F Emsley (via ID Planning) (1938) Redrow Homes (Yorkshire) Ltd (5671) Great North	Support for the proposed selective review of the Green Belt but concern that there is very little detail how the selective review will take place and the timing of the review (other than reference to the Site Allocations	Support welcomed  The Core Strategy emphasises the need for early progress to be made with the preparation of the Site Allocations DPD. A scoping report for the preparation of the Site Allocations DPD	No change.

Developments Ltd c/o Evans Property Group, Barratt David Wilson	DPD). This is a key strategic issue which needs to be addressed.	has been agreed by the City Council's Executive Board and it is envisaged that consultation on Issues and Options will take place in early 2013, consistent with the agreed	
Homes, Consortium of Housebuilders Edmund Thornhill Thornhill Estates, Redrow Homes	Support for existing Protected Areas of Search to be identified for housing and for the identification of new PAS land.	programme and timetable.	
(Yorkshire Ltd.), Housebuilder Consortium, Robert Ogden Partnership Ltd, ELE Northern Quadrant Consortium, Wortlea Estates (via ID Planning) (5895) Barratt David Wilson Homes Yorkshire Homes	The proposed amount of PAS land to be identified of at least 10% is not justified and it is considered this is not the most appropriate strategy when considered against the reasonable alternatives.	As set out in paras. 4.8.6 – 4.8.7, the Core Strategy, consideration will also need to be made to the identification of Protected Areas of Search. The precise location of such areas will need to be considered as part of the preparation of the Site Allocations DPD and at this stage it is anticipated that this should account for at least 10% of the total land identified for housing. This overall approach is considered to be reasonable and realistic and will be subject to review through the Site Allocations process.	No change.
(5835) Persimmon Homes	Support for Green Belt review but concern regarding lack of detail regarding when it will take place and how it will be done.  Need to ensure that new Green Belt boundaries will endure. All existing PAS land should be identified for housing allocation at earliest opportunity Support for approach to identify new Protected Areas of Search land.	Support welcomed.  The Core Strategy emphasises the need for early progress to be made with the preparation of the Site Allocations DPD. A scoping report for the preparation of the Site Allocations DPD has been agreed by the City Council's Executive Board and it is envisaged that consultation on Issues and Options will take place in early 2013, consistent with the agreed programme and timetable.	No change.
		It is accepted that Green Belt boundaries will need to endure and this will be an important consideration as part of the Site Allocations DPD process. Within this overall context, existing and potential future PAS, will need to be considered.	No change.
(5121) Directions	Support in principle for the Green Belt	Support welcomed.	No change.
Planning (on behalf of	review and for the Core Strategy to be	Delian OD40 in act within the consult context of the O	
Otley Town Partnership & Mr and Mrs Haigh)	adopted at the earliest opportunity but concern that a Green Belt review is	Policy SP10, is set within the overall context of the Spatial	
α ivii and ivirs haigh)	necessary so soon after UDP Review	Vision of the Core Strategy and national guidance. Based upon the evidence base (including population forecasts),	
	(2006), given the need for Green Belt	Leeds needs to plan for urban regeneration and growth.	
	permanence, as set out in national	This overall approach takes into account existing planning	
	guidance. The Core Strategy Green Belt	permissions and the availability of brownfield land. Within	
	review therefore needs to take into account	this context, whilst seeking to secure the delivery of	

	growth beyond the plan period.  Exceptional reasons are also required for the release of Green Belt land.	previously developed land within the urban area, a selective Green Belt review is also necessary. This overall approach is considered to be consistent with the NPPF.	
	Criterion (iv) and (v) need to be reviewed and updated in light of the NPPF.  The approach needs to be reviewed because saved policies in the UDP now carry limited weight.	Government advice is that where 'Saved Policies' remain consistent with national guidance, they can be retained. A number of UDP saved policies relating to the Green Belt are very detailed and in any event, it would not be appropriate for them to be reviewed as part of a Core Strategy.	No change.
	The policy fails to mention the approach towards major development sites in the Green Belt. The policy also fails to mention the new requirements of a Green Belt review as set out in the NPPF, which includes looking at potential impacts beyond the district and Green Belt boundary.	Major Development sites in the Green Belt are no longer identified as a separate category in the NPPF.	No change.
(5510) Walton & Co	The Green Belt review needs to be significant, not selective, as view that the housing requirement is too low and need for the Green Belt boundary to endure beyond the plan period.	Policy SP10, is set within the overall context of the Spatial Vision of the Core Strategy and national guidance. Based upon the evidence base (including population forecasts), Leeds needs to plan for urban regeneration and growth. This overall approach takes into account existing planning permissions and the availability of brownfield land. Within this context, whilst seeking to secure the delivery of previously developed land within the urban area, a selective Green Belt review is also necessary. Detailed boundaries will need to be considered as part of the Site Allocations DPD process. This overall approach is considered to be consistent with the NPPF. It is not accepted that the housing requirement is too low. The requirement reflects the conclusions of the Core Strategy evidence base and is considered to be acceptable and realistic. (see also analysis of responses to Spatial Vision section and SP6).	No change.
(5543) DPP	The Core Strategy should undertake a full rather than selective Green Belt review.	The approach of the Core Strategy is consistent with NPPF. The Core Strategy and emerging Site Allocations DPD, form part of the 'local plan' for Leeds, with the Core Strategy setting the strategic context for the site allocations. It is not necessary for the Green Belt review to be conducted in	No change.

		advance of the submission of the Core Strategy. A selective review can be justified on the basis of the strategic approach to locating growth, consistent with the Settlement Hierarchy and the scale and broad distribution of housing growth which is being planned for.	
	Support that the review will consider Green Belt releases around the Main Urban Area, the Major Settlements including Wetherby and the Smaller Settlement including Boston Spa, Bardsey, Collingham and Barwick in Elmet. In this regard the policy has been positively prepared and is justified.	Support welcomed.	No change.
	Support that new Protected Areas of Search ('PAS Land') will be identified to replace those areas that will be allocated but need to be more specific on the quantum required to ensure Green Belt boundaries endure (to be consistent with national guidance).	Support welcomed. As set out in paras. 4.8.6 – 4.8.7, the Core Strategy, consideration will also need to be made to the identification of Protected Areas of Search. The precise location of such areas will need to be considered as part of the preparation of the Site Allocations DPD and at this stage it is anticipated that this should account for at least 10% of the total land identified for housing. This overall approach is considered to be reasonable and realistic and will be subject to review through the Site Allocations process.	No change.
(5649) Betterspot Limited (BBB) (via Robert Halstead Chartered Surevyor)	General support for Policy but need for the relevant NPPF paragraphs to be inserted into (iv) e.g. para 80 of the NPPF.	Support welcomed. The overall policy approach is considered to be consistent with the NPPF and it is not considered appropriate to repeat extensive sections of the NPPF within the policy wording.	No change.
	View that reallocation of current Green Belt land to allocations under the LDF should be a last resort and that current open land within the urban/built up areas (non green belt) should be allocated for future development. Within this context, view that, It is difficult to see how an exceptional case for green belt releases can be made (when there is other suitable and available non green belt land which can accommodate housing or employment	The approach of the Core Strategy is consistent with NPPF. The Core Strategy and emerging Site Allocations DPD, form part of the 'local plan' for Leeds, with the Core Strategy setting the strategic context for the site allocations. It is not necessary for the Green Belt review to be conducted in advance of the submission of the Core Strategy. A selective review can be justified on the basis of the strategic approach to locating growth, consistent with the Settlement Hierarchy and the scale and broad distribution of housing growth which is being planned for.	No change.

	development in a sustainable manner).		
(0782) University of Leeds	The Core Strategy has failed to consider the full range of opportunities for accommodating the estimated housing need. Not considered whether a new settlement (new Garden City for Leeds) in principle, and specifically located at Bramham as a strategic site would address the housing issues. Therefore is unsound.  Employment, local services, and community facilities would also be provided as part of a new settlement, plus dedicated high frequency bus service to make it a highly sustainable location.  Inevitable that there will be Green Belt loss in Outer North East area. 1999 UDP Inspector's report considered harm to objectives of the green belt and concluded it is sufficiently separated from Bramham and Tadcaster that would preserve the separate identities of the settlements, and the site only performs a limited function in terms of checking the sprawl of the main urban area. (Concluded no new settlement was necessary at that time).	The focus of the Core Strategy approach has been developed as part of the Issues and Options and Preferred Approach stages. A key outcome of this process has been the need to give emphasis to the use of brownfield land within urban areas, as a focus for regeneration and growth, whilst recognising the need for some greenfield development and a selective Green Belt review. Integral to this approach also is the need to maintain the character and distinctiveness of Leeds and the Settlement Hierarchy.  In reflecting this overall approach, Policy SP10 as drafted, focuses the selective Green Belt review upon the settlement hierarchy. The supporting text which follows (iii) accepts that exceptions may exist for development in 'other settlements', where opportunities reflect the broad support of the plan and sustainability considerations. Within this context also, (v) also sets out an approach to proposals, outside of the selective review.  Against this framework and within the context of the Outer North East Housing Market Characteristic Area, the proposal may have some potential, if it can be demonstrated that the development is in a sustainable location, is able to provide a full range of local facilities and services, to meet its needs and can make a significant contribution to housing delivery within the plan period. To reflect this view a change to the policy wording is recommended.	Change:  Amend the policy text after (iii) as follows:  "Exceptionally, sites in other settlements outside the Settlement Hierarchy could be considered, where they are will be in sustainable locations with access to and are able to provide a full range of local facilities and services and within the context of their Housing Market Characteristic Area, and where sites are more appropriate in meeting the spatial objectives of the plan than the alternatives in higher order settlements within the Settlement Hierarchy. Otherwise review of the Green Belt will not be considered to ensure that its general extent is maintained.

#### **APPENDIX 2 - CHANGES TO CORE STRATEGY TEXT**

# 4.8 Green Belt

#### **SPATIAL POLICY 10: GREEN BELT**

A selective review of the Green Belt will need to be carried out to accommodate the scale of housing and employment growth identified in Spatial Policy 6 and Spatial Policy 9, as well as an additional contingency to create new Protected Areas of Search (to replace those in the UDP which will be allocated for future development). The selective review will generally consider Green Belt release around:

- (i) the Main Urban Area (Leeds City Centre and surrounding areas forming the main urban and suburban areas of the city);
- (ii) Major Settlements of Garforth, Guiseley/Yeadon/Rawdon, Morley, Otley, Rothwell and Wetherby;
- (iii) Smaller Settlements (listed in Table 1 : Settlement Hierarchy);

Exceptionally, sites in other settlements outside the Settlement Hierarchy could be considered, where they are will be in sustainable locations with access to and are able to provide a full range of local facilities and services and within the context of their Housing Market Characteristic Area, and where sites are more appropriate in meeting the spatial objectives of the plan than the alternatives in higher order settlements within the Settlement Hierarchy. Otherwise review of the Green Belt will not be considered to ensure that its general extent is maintained.

In assessing whether sites in the selective Green Belt review should be allocated for development, the following criteria will be applied:

- (iv) Sites will be assessed against the purposes of including land in Green Belts identified in national guidance (PPG2/Draft National Planning Policy Framework). These purposes are:
  - o to check the unrestricted sprawl of large built up areas,
  - to prevent neighbouring towns from merging,
  - o to assist in safeguarding the countryside from encroachment,
  - o to preserve the setting and special character of historic towns; and
  - to assist in urban regeneration.
- (v) Development proposals not part of the selective Green Belt review will be considered against the suite of Green Belt policies saved from the UDP and through the emerging guidance and legislation of the Localism Act.