

From:
To: [Site Allocations Plan](#)
Cc: [Collins, Clr Dawn](#);
Subject: PDE00362_LCC - Site Allocation Consultation - HG2-41, HG2-12, HG3-2, HG3-3, HG2-43
Date: 14 October 2015 21:51:48

LCC is inviting comments is inviting comments on:

- Have the plans been positively prepared?
- Are the plans justified?
- Will the plans be effective?
- Is the plan consistent with national policy?

RESPONSE - I believe the plans are to justified as they depend too heavily on Green Belt instead of alternative sites

Regarding Site Allocation Consultation and the National Planning Policy Framework, I wish to lodge an objection on the following basis.

Sustainable development section 9 is entitled -

79. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt Policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of green belts are their openness and their **permanence** -

Objection - I believe the use of large sections of local Green Belt is inconsistent with this paragraph.

80 . Green Belt serves five purposes -

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the settling and special characters of historic towns;
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Objection - I believe the use of local green belt sites ignores several of the above purposes and is therefore inconsistent with national policy

in preparing its site allocation proposal, Leeds has completely disregarded the fifth purpose - **I believe that disregarding the fifth purpose makes the whole process inconsistent with the NPPF**

82 Starts by stating - the general extent of Green Belts across the country is already established.....

87 States: aAs with previous Green Belt Policy, in appropriate development is, by definition, harmful to the Green Belt and should not be approved except in **very special circumstances**

On 3rd Feb 15 Brandon Lewis, the Housing Minister, stated in parliament to answer a question from Stuart Andrew MP: 'Unmet housing needs should not exceed maintaining the greenbelt, and this is put forward in the National Planning Policy Framework'

I , therefore, believe the use of Green Belt to meet housing numbers is inconsistency with National Policy

Chapter 11 of the sustainable development section of the NPPF states:
109 the planning system should contribute to and enhance the natural and local environment by:

- Protecting and enhancing valued landscapes.....
- Recognising the wider benefits of ecosystem services;
- Minimising impacts on biodiversity.....

I believe the use of several proposed sites is inconsistent with this aspect of national policy

LEEDS CORE STRATEGY

The NPPF requires local authorities to produce 'Local Plans' for development. The Core Strategy is at the heart of Leeds Local Plan.

In its Glossary it defines Green Belt as follows:

'A designation for areas of open land around certain cities and large built-up areas where strict planning controls apply to keep this land **permanently open or largely undeveloped**'

It also restates the 5 purposes of Green Belt

Section 1.8 of the core strategy states

Key Priorities therefore include: planning for the provision of homes and jobs in sustainable locations, respecting local character and distinctiveness in the delivery of the Plan's objectives and maximising opportunities to recycle previously developed land (PDL) whilst minimising greenfield and Green Belt release, nine planning for longer term growth.

Page 60 of Leeds Core Strategy , under **paragraph 4.11**, contains a map of Leeds Green Belt which shows many of the sites proposed for housing allocation area in Green Belt

Page 78 of Leeds Core Strategy, titled '**KEY DIAGRAM**', is a map identifying '**Strategic Green Infrastructure**' many of the proposed sites conflict with this.

I believe that not only is the site allocation inconsistent with national policy, it is also inconsistent with LEEDS OWN ESTABLISHED POLICY

HOUSING TARGET NUMBERS

LCC set a target of 70,000 new houses by 2028 consisting of 66,00 planned sites with an extra 4,000 unplanned sites. This is based on out of date statistics.

LCC is aware of ore recent statistics based on the 2011 census. They show that the

population is only likely to grow by 64,000 **people the** same period.

Recently the National Housing Federation identified there was a shortfall in housing built in the last 4 years of 516,510 homes. The government confirmed it would consider building 1 million new houses by 2020 a success. Leeds' fair share of that, based on population size would be **2,974 houses per year** giving a 15 year target of **44,610**

I Therefore believe the use of obsolete housing target figures, although already approved, is inconsistent with both national policy and the Core Strategy.

And finally, your suggested plans don't seem to have taken into account the effect this would have on congestion of traffic on the ring road and A65. Although you may say those existing problems could be addressed, it certainly hasn't been addressed so far.

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