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Site Allocation Consultation Submission - Response in relation to the Leeds Site Allocation Plan

This response will focus on the wider plan and the question of soundness rather than individual sites which have many issues to be addressed in other consultation responses.

First and foremost the Site Allocation is a plan. That might be stating the obvious but as a career senior Programme and Project Manager the key requirement of a plan is that it is deliverable, both in terms of clearly defined requirements which have been properly evidenced and timescales.

This plan is neither of these two things and is therefore not sound. It has not been positively prepared and is not justified. As the plan must be these things to be legally compliant it is therefore also not legally compliant.

The Site Allocation Plan aim is deliver the number of houses identified as being required in the Core Strategy as objectively assessed need – essentially this is the business case for the plan. The housing numbers of 74,000 houses gross or 66,000 houses net have clearly been proven as excessive and therefore the plan is fatally flawed. The latest ONS figures and the council's own officials now accept that the numbers should be reduced by at least 10,000 more likely down to 45,000 and yet refuse to do this ahead of the Site Allocation. This means that sites have to be identified which are not required – for what purpose?

The holy grail of the Local Development Framework is to fulfil the requirement of the National Planning and Policy Framework to ensure a rolling 5 year land supply based on housing need which has been objectively assessed. Leeds is currently fending off multiple appeals on Safeguarded land on the basis of having a 5 year land supply but how long can this last?

It will never be possible to deliver the annual number of houses proposed in the Core Strategy, this is again accepted by all including developers and therefore as the short fall mounts up the 5 year land supply will slip and more and more sites that have been excessively identified in the Site Allocation Plan will have to be released. Leeds have promised a review in 3 years but once sites have been allocated in this Site allocation it

will be very difficult to remove the presumption in favour of development and therefore sites will be at risk whatever the outcome of any review.

The sites that will pay the price are the green belt sites and those on Greenfield which make up over 35% of the total. This sounds reasonable until you consider that the Housing Market Characteristic Areas on the out skirts of Leeds will see their greenbelt and character severely impacted. In the case of Aireborough for instance 97% of housing is on green space and in the Outer South East 87%. Leeds City Council try to say that housing has been distributed “fairly” and everyone has to take a “fair share”. For the plan to be positively prepared the housing allocation should be distributed on the basis of need in the locations where housing is required not on a percentage lottery based on arbitrary groupings, the methodology of which seems to have been lost in time.

It has been pointed out that housing need does not constitute “exceptional circumstances” for release of greenbelt that is still fulfilling the 5 purposes of greenbelt but Leeds City Council have conveniently ignored this. Local communities whose greenbelt areas are affected are being expected to settle for the “least worst” option rather than a positively planned development of their communities which is unacceptable.

This plan should also be about ensuring regeneration in key areas of Leeds that have many brownfield sites and are crying out for investment and development. Leeds City Council have attempted to address this with the Site Allocations in those areas and with the Aire Valley Regeneration Plan, however they are at the mercy of where developers choose to build. In other words where the most profit is. In proposing a plan based on unachievable numbers with a guarantee of failure to deliver year on year they are putting in jeopardy this much needed regeneration as more favourable sites on greenbelt are forced to be released.

The Site Allocation information for each site is in most cases pitiful. A housing site in Garforth which is expected to take 2314 house on greenbelt has less than a side of A4 as to what that will mean to the community and yet Leeds City Council is expecting meaningful consultation? Genuine concerns about infrastructure delivery, highways, water and drainage, schooling and health are simply “to be discussed later” – how does this build any sort of confidence for local residents?

I have seen excellent submissions from others detailing lots of evidence and reasons why this plan is unsound and alternatives and I sincerely hope the residents of Leeds have responded in enough numbers to make a difference. This is in spite of the fact that the Consultation has been so poorly publicised relying on local groups to use any means possible and social media to try and encourage local neighbourhoods to participate.

Neighbourhoods – now that is an interesting word and leads on to Neighbourhood plans. Leeds prides itself on having a large number of Neighbourhood plans in production and yet they specifically choose not to work actively with Neighbourhood planning teams to

develop the site allocations for this round of consultation. Why not? Surely this defeats the whole spirit of the Localism Act 2012?

We are often told that the Core Strategy has been approved and is not part of this debate and therefore we have to ignore the key question of housing numbers and find the number of sites that make up the “right” or current number of houses regardless.

This is like continuing to prepare and plan for a meal for 100 people when you know for a fact that only 75 people are coming. Why would anyone source tables and chairs, glasses and plates and food for 100 people when it is not all needed? It makes no sense. Anymore than this plan does.

And that is the ultimate feedback – does this plan stand the test of common sense and the answer is a resounding no. Mind you when did common sense make any difference in the world of the council and politics.

Unfortunately the council, councillors and politicians will not be paying the price – it is local people.