

We are pleased to provide comment on the Proposed Main Modifications, prepared on behalf of the Yorkshire Greenspace Alliance by Andrew Wood, Planning Officer for CPRE West Yorkshire. Please accept our apologies for providing these as one document: this is partly in the interests of brevity, though mainly due to severe time pressures resulting from our involvement in several Local Plan consultations happening concurrently. We trust that we have structured the document as helpfully as possible.

<p>MM2, MM4, MM7 and MM9.</p>	<p>Object: Not justified by the evidence.</p> <p>Following the lengthy discussion of this issue at the Public Examination, we maintain our objection to the changed settlement hierarchy, which has generated many of the main modifications. The developer representatives who drew attention to shortcomings in the HRA made a convincing case that the settlement hierarchy had demoted Burley and Menston in order to reduce the scale of development in them, so as to relieve pressure on the SPA/SAC.</p> <p>In our view, this is a case of putting the cart before the horse: the problem is that an increase scale of development in the Airedale and Wharfedale corridors not only puts increased environmental and infrastructure pressure on those corridors, but also weakens the urban emphasis of the Plan as a whole. Across the district, sustainable development is better served by maintaining urban focus, and complementing it with growth around a small number of highly accessible hubs. <i>Within</i> the Airedale and Wharfedale corridors, sustainable development is better served by having fewer, larger hubs, and therefore fewer higher order settlements in the hierarchy. This remains the case, irrespective of the HRA issue, and hence the settlement hierarchy change runs counter to sustainable development.</p>
<p>MM3</p>	<p>Object: Not effective.</p> <p>In our view, windfalls should be viewed in light of their 'fit' with, and contribution to, the settlement hierarchy. If a large windfall site would skew the settlement hierarchy, in terms of the spatial emphasis of land supply and/or the rate of delivery, then the policy needs to be able to provide for refusal of planning permission on that site.</p> <p>This opens up a broader point, which we raised at the Public Examination, that the settlement hierarchy must apply not only to the distribution of sources of land supply, but also to managing delivery. Put simply, higher order settlements are expected to develop more quickly and more intensively than lower order settlements, and the spatial distribution of planning <i>permissions</i> should reinforce that, be they on allocated sites or windfall sites.</p>

<p>MM14 and MM15 and MM16</p>	<p>Object: Not effective.</p> <p>These modifications provide for an ‘offsetting’ approach to impacts on the SPA/SAC, which is inappropriate. In our view, adverse effects on the SPA/SAC are largely separate from the wider issue of restoring and enhancing Green Infrastructure and natural green space; so the two objectives should be separated out, ie “provide and enhance natural green space and Green Infrastructure’ AND ‘mitigate any adverse effects on the SPA/SAC’.</p> <p>An exception to this is that offsetting might be beneficial in a situation where additional recreational open space can be specifically designed and located to divert recreational pressure away from sensitive areas, but it is unclear how this might be implemented.</p>
<p>MM17 and MM18</p>	<p>Object: Not justified by the evidence.</p> <p>The reference to <i>‘a selective review of Green Belt boundaries in locations that would not undermine the strategic function of the green belt within the Leeds City Region’</i> reveals the worrying extent to which the Core Strategy’s approach to Green Belt is not justified by the available evidence, for the following reasons:</p> <ol style="list-style-type: none"> 1. There has been no full analysis of the strategic function of Green Belt across Leeds City Region; 2. Without a comprehensive review based on that missing analysis, any selective review will inevitably start from a pre-conceived assumption as to which sites and locations make more or less contribution to the strategic function of the Green Belt; 3. Probably the most crucial function of the Green Belt when considered at a city region-wide, strategic scale is that of assisting urban renewal by encouraging the re-use of previously developed urban land – no evidence has been gathered as to whether the net effect of changes to the Green Belt arising from disjointed reviews in Bradford, Leeds, Kirklees and Calderdale will undermine that function. <p>In our view, looking to the Green Belt to supply 11,000 new homes risks creating a damaging degree of dispersal away from urban areas, and no convincing evidence has been presented to demonstrate that it would not do so. Without that evidence, changes to the Green Belt are <i>ad hoc</i>, and should not take place.</p>
<p>MM19 through to MM37</p>	<p>Object: Not effective.</p> <p>We acknowledge that many of the proposed main modifications reflect the Council’s response to the new HRA. We are not in a position to question the</p>

	<p>merits of the HRA itself as a piece of evidence. However, our chief concern is that this suite of modifications – especially MM23, 24 and 25 - has the effect of demoting the strategic significance of the SPA/SAC, deferring any consideration of its planning implications to ‘lower tier plans’.</p> <p>Most importantly, there is now no clarity or strategic steer as to whether, when ‘lower tier’ planning is taking place, there is any facility to shift the spatial emphasis of development from one location to another across the district, in response to the ‘more detailed information/assessments’ that are envisaged. Without that facility – and with many sites deleted from the Green Belt and allocated for development – the Local Plan as a whole is left with very little ability to modify the pattern of development if impacts to the SPA/SAC become apparent.</p> <p>The SPA/SAC is a major strategic issue and the Core Strategy should retain the locus to plan, monitor and manage development effectively as and when further evidence of pressures on the SPA/SAC emerges.</p>
<p>MM38 through to MM56</p>	<p>Object: Not positively prepared.</p> <p>Whilst in terms of the percentage of allocation, the development emphasis remains focused on the inner urban areas of the District, it is deeply worrying that the proposed response to a changed settlement hierarchy is to draw 1,100 dwellings away from inner areas, especially Bradford City, and towards Wharfedale and Airedale. This demonstrates exactly the decentralising effect that we have consistently campaigned against. Not only is this less sustainable in infrastructure terms – adding pressure to heavily congested arterial roads that blight communities with air and noise pollution and physical separation; but it reduces the Plan’s focus on regenerating urban areas.</p>
<p>MM89 through to MM92</p>	<p>Support: Improves the effectiveness of the Plan.</p> <p>We warmly welcome the clarification of phasing policy, which will assist in maintaining a focus on those sites that better deliver the spatial objectives of the Plan. In particular this demonstrates recognition of the fact that phasing does not constrain the meeting of housing land supply.</p> <p>We also strongly support the ‘Liverpool approach’ to catching up with a historical backlog of completions, since this provides a sound basis for delivery that does not put unrealistic demands on the five-year land supply.</p>
<p>MM93</p>	<p>Object: not effective or justified by the evidence.</p> <p>The Plan’s approach to housing density is still woefully inadequate, and we are very disappointed that our previous representations on this point have not been heeded. A dispersal of allocation away from the inner urban areas – where density assumptions are higher – towards more peripheral areas</p>

	<p>where density assumptions are lower – worsens the problem by increasing the total amount of land that is needed in order to meet the housing requirement. Our view remains clear: development at less than 45 dwellings per hectare (net) should normally be considered to be unsustainable, and locations that cannot support those densities should not be considered for site allocations.</p>
MM96	<p>Object: not effective.</p> <p>This change will render the PDL targets ineffective. A specific target is no more attainable than a range, and removing ‘minima’ opens up a semantic interpretation of the targets as maxima, therefore sending out entirely the wrong message about the importance of re-using PDL. This a poorly argued and counter-productive modification which should be reversed.</p> <p>Additionally, it is unclear whether the implementation strategy referred to here will provide for monitoring and action to adjust for under-delivery of PDL targets under Policy HO6D.</p>
	<p>END OF COMMENTS.</p>