

**From:**  
**To:** [Site Allocations Plan](#)  
**Subject:** PDE00165\_HG2-5 (Sites 2163a\_1180a\_1311a) and HG2-6 (1113)  
**Date:** 28 October 2015 16:42:29

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Good Afternoon

We would like to comment on the Leeds Site Allocations Plan, specifically the above sites (HG2-5 (Sites 2163a/1180a/1311a) and HG2-6 (1113)). My husband and I are of the view that these plans are **Not Sound**. The plans are not positively prepared due to the following:-

- No assessment of local housing needs
- Disproportionate development in Aireborough and surrounding areas in recent years has put excessive strain on local roads, infrastructure and services already. There is no infrastructure plan for Aireborough and no evidence base has been gathered by LCC which is totally unacceptable.
- There are no brown field sites left
- There has been no consultation with the Community or Bradford.

In our view, the plans are not justified due to the following:-

- As no evidence has been gathered, it is impossible to judge
- The plans are merely a desire to build 70,000 houses on the land offered by developers
- There have been multiple breaches of the NPPF (National Planning Policy Framework)
- Alternative sites nearer the motorway network/close to jobs has not been properly explored

The plans are not effective due to the following:-

- A school on Coach Road is ludicrous due to very poor site access. Even if a new access road is built, you cannot force parents to use it. Thus the Silverdale Estate, which only has one narrow access road, will become blocked with additional traffic and cause health & safety and emergency access issues.
- There have been multiple breaches of the NPPF.
- There has been no implementation plan for Coach Road – or any details of the school provider, size etc or for the allotments sites (I understand that 3 owners are currently refusing to sell to a developer).

In our view, the plans are not consistent with the NPPF:-

- There have been multiple breaches – 31 sections out of 219. Specifically, these are 30, 32, 34, 35, 36, 37, 38, 69, 70, 73, 74, 75, 76, 79, 80, 81, 83, 86, 87, 88, 89, 93, 95, 109, 110, 111, 114, 117, 118, 178 and 179.

We totally disagree with the proposed development and I give below some of the reasons why:-

**Ecology and Landscape** – The Coach Road fields are regularly used by dog walkers and families. I have often seen families having a picnic in the second field during the summer months. The stream in the woods is used for Pond Dipping (educational value to children) and there are a

variety of woodland plants such as bluebells. I have often seen families of deer in this area, foxes and badgers. I have also seen many species of birds including Jays (which are not common). There is also a green link corridor connecting the Engine Fields nature reserve in Yeadon with the wider countryside (Coach Road fields to Esholt Woods).

**Local Services/Facilities** – The GP surgery in Netherfield Road is being run down resulting in patients having to travel to the other practice at Yeadon Health Centre – a car or bus ride away. This leaves only one GP Surgery on Park Road which has an extremely full patient list.

We understand that there is a waiting list for allotments in Leeds. Why can't those on Silverdale Avenue be rented out to someone on the waiting list?

**Schools** – Hundreds of children use the old railway line from Guiseley to Yeadon as a means of walking safely to the schools which branch off this (St Peter's St Pauls, Westfield). Older children also use the unmade Coach Road to walk safely to Guiseley School.

**Conservation/Heritage** – We believe there is a lack of justification for building on Green belt and Greenfield sites. All 3 Coach Road sites are within designated Green Belt and "Special Landscape Area". Guiseley Conservation Area incorporates site 2163a, site 1180a and part of 1311a, all of which are within the 100m buffer zone. The area leads down into Esholt Woods via Springs Road which is an ancient "green" lane. The allotments are designated as Greenfield site and have been in existence since 1921 when Park Gate Allotments were formed on land once owned by a local mill owner.

**Loss of Greenbelt** – The unsoundness of the fact that over 90% of the sites in Aireborough to be allocated are Greenbelt for the following reasons:-

- To check the unrestricted sprawl of large built up areas.
- To prevent neighbouring towns from merging into one another (Coalescence of Areas). Guiseley was a small town when I moved here 28 years ago but now it seems to merge with Yeadon.
- To assist safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

Most of Aireborough's brownfield sites have been built on in recent years and it is now time for other brownfield sites elsewhere in Leeds to be examined. A total of 3,367 houses have been built in Aireborough in recent years, 967 since 2012. This figure is increasing all the time.

**Highways/Transport** – The lack of positive planning and ineffectiveness of the impact of extra housing/a school on the estate and the wider impact on the A65 and beyond. The A65 is already gridlocked at peak times which has a detrimental effect on surrounding roads such as the A658. This will increase with the opening of Apperley Bridge Railway Station and the expansion of Leeds/Bradford Airport. The opening of large Stores such as TK Maxx and ASDA Home and the expansion of Next on Guiseley Retail Park means that Guiseley is also gridlocked at weekends. There are often queues of traffic along Park Road from one end to the other making it already impossible to exit the Silverdale Estate without being "let into the traffic".

In our view, the following errors were made in the Sustainability Assessments of the sites and,

therefore, it has not been positively prepared and is unsound:-

- There have been no Traffic Surveys of the sites
- There has not been any Ecology Survey – assessment has been based on negligible data.
- There has been inadequate flood risk assessment which ignores the many known springs in the area
- There has been failure to assess the impact on air quality (NO2) as a result of the huge increase in traffic/local gridlock
- The plans ignore the fact that this is a Conservation and Special Landscape Area.
- The negative impact on the local community has also been ignored together with access to education.

In our view, the following needs to be done to make the plan sound:-

- Reduce the Leeds housing target from 70,000 to 44,000 (ONS data)
- Abide by the NPPF.
- Carry out a review of housing need as the current data is out of date. A local housing need Survey needs to be done.
- Take advantage of the new brownfield funds and schemes that make brownfield sites more viable for developers
- Ensure there is an Infrastructure Plan in place before the Site Allocations Plan.
- Build closer to an area with better infrastructure, transport links and to where the bulk of the jobs are, eg Central Leeds and the Aire Valley
- Carry out a comprehensive Greenbelt Review, as required by the previous Planning Inspector
- Conserve Conservation areas – preserve local distinctiveness and character
- Respect Special Landscape Area designations for local character and distinctive as well as sustainability
- Allocate the allotments as community allotments and to not allow them to be left as wasteland by absentee landowners.
- Genuinely engage with local communities, **DO NOT** pay lip service to consulting the public.

There should be more co-operation with Bradford Council. LCC have a duty to co-operate with Bradford, especially in the many Aireborough sites with border areas. Esholt woods are under the jurisdiction of Bradford Council and the Coach Road fields are discussed in their own Wildlife Area Evaluation for Esholt Woods but yet no regard has been placed on this by Leeds.

Finally, we do not consider the plans to be legally compliant for the following reasons:-

**Statement of Community Involvement** – There has been no community involvement.

**Sustainability Appraisal Report** – There has been no genuine attempt to engage with the local community (no attempt to educate people on what is being proposed and how they can get involved. All local publicity on the proposed developments has come from amateur activists.

**Town & Country Planning (local planning) Regulations** – There has been no collaboration with Bradford.

**Duty to Co-operate** – There has been no adherence to many sections of the NPPF or Leeds own planning policies and seemingly little internal collaboration between different elements of LLC – highways, school planning, ecology etc.

Yours faithfully

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