

**From:** [Pickering Lois](#)  
**To:** [Site Allocations Plan](#)  
**Cc:** [Speak Stephen](#); [Hill Tim](#); [Mackay Ian](#); [Harvatt Adam](#); [Feeney David](#)  
**Subject:** PDE00368\_FW\_ Site Allocation Submission  
**Date:** 14 October 2015 09:08:10

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I am forwarding this to the sap in box as it is a representation on the plan. Adam – I think we should acknowledge this as a representation – he won't receive the standard response from the sap inbox as he hasn't sent it to there – please can you do this.

Thanks

Lois Pickering  
Team Leader Local Plans West  
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Leeds City Council  
Tel: 0113 2478071

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**From:** Dobson, Cllr Mark  
**Sent:** 13 October 2015 18:22  
**To:** Speak, Stephen; Pickering, Lois; Hill, Tim; Mackay, Ian  
**Subject:** Site Allocation Submission

### **Site Allocation Submission as Part of the Public Consultation**

#### **1) Context**

Leeds is being consulted on potential housing growth of 66,000 homes. We have to demonstrate to the Government that we have sufficient land supply in unique Housing Market Characteristic Areas (HMCAs) across the city.

So, how has this come about?

Historically, Leeds had a sequential brownfield-first policy. This meant, simply, that with the 340+ brownfield sites available across the city, Leeds was demonstrating not only local supply but also protecting greenbelt sites from speculative development requests. Indeed, there are currently many brownfield sites with live planning permissions in place for in excess of 10,000 homes. These would, based on current housing projections and population growth forecasts, deliver sufficient land supply for at least ten years.

The list of Council owned brownfield sites, and their current standings, is available here:

<http://democracy.leeds.gov.uk/documents/s128976/240315%20Scrutiny%20Brownfield%20Land%20APPENDIX%201.pdf>

I think this clearly shows that there is actually no need to actively progress sensitive land supply.

So this begs the further, and fundamental, question: why is Leeds being asked to forfeit greenbelt sites, when there are live permissions granted and a brownfield supply available to satisfy the housing needs of the city for at least a decade?

The simple answer is this: there has been a loss of local planning control due to the demands of the Government and the Government Inspector. In Leeds there have been TEN successful appeals from developers who had submitted applications for housing development on greenbelt land. All were planning permissions rejected by Leeds City Council, in line with the sequential brownfield policy, but later passed by the Government Planning Inspector. And this was replicated on sensitive sites up and down the country.

It became very clear, very quickly, that the Government had relaxed planning rules. And the shift of emphasis to support greenbelt development would require a major policy rethink. Quite simply, the Government Planning Inspectorate no longer held local planning policy as inviolable.

#### **2) Precedent (Garforth)**

In 2010 Leeds City Council rejected the Garforth Cliff development because it was contrary to the sequential brownfield policy. The developer lodged an appeal. At the Public Inquiry I made representations drawing attention to flooding in the area, school provision, removal of a local amenity, traffic movement, infrastructure and contradiction with existing council policy. The only question the Planning Inspector asked me under examination was "Where would you put them then?"

Despite pointing out the live permissions already granted, the healthy supply of brownfield sites ready and available and that the council was (and is) ready to help facilitate the development of these sites within planning policy, my arguments were roundly rejected. Why? Because there had clearly been a shift in emphasis: Leeds had to demonstrate "land supply", a phrase I'll come back to, in all Housing Market Characteristic Areas (HMCAs), another term I'll revisit, across the city.

All ten appeals were won by the developers. The situation is now unambiguous: the council's sequential brownfield-first policy no longer holds any water when challenging and rejecting development of and on the greenbelt.

The first round, aided and abetted by the Government, had gone to the developers.

### **3) Land supply and Housing Market Characteristic Areas (HMCAs)**

Land supply is a key term. We know that sufficient land was, and still is, available in the city. But developers now have the right to submit applications on any land in any location, with a guarantee of winning on appeal, unless the council can demonstrate sufficient land supply. And this land supply must be adequate across each HMCA.

HMCAs were established through the Strategic Housing Market Assessment (SHMA), which was prepared by consultants for the council through 2010 and published in 2011. They were designed to reflect market areas that people relate to when they are looking for a house; they also relate to the four affordable housing zones.

Most of Garforth and Swillington ward is in the Outer South East HMCA. A small part is in Leeds East HMCA.

### **4) Garforth**

In 2013 a Site Allocation Consultation exercise was launched in Leeds to try and frame what land supply would look like. A legitimate question I'm often asked is "there's land at X, Y or Z location, why isn't it in the site allocation proposals?" And the answer is this: the council can only add land into the consultation process which either land owners, developers or other interested parties have put forward for consideration. So, to give a hypothetical example, I might think a piece of farmland would be ideal to build 100 units. But this is immaterial. The farmland could only be considered if the farmer who owns the land, or a developer who has an option on the land, proposes it.

In Garforth and Swillington Ward there were many sites put forward for consideration, and during that period I attended and hosted several public meetings to discuss them. It was very clear from these meetings that residents' main concerns tended to follow key themes: road congestion on existing networks, flooding, infrastructure issues around green space provision and new drainage, school provision and new highway provision.

Garforth residents took part in the consultation by their thousands and the overwhelming concerns can be summarised as follows:

- Development of the greenbelt on Wakefield Road, Se by Road, Barwick Road and the many smaller in-fills that were put forward
- The consequences of developing all of the land east of Garforth without proper infrastructure
- The need to develop in a sustainable way, without impacting on an already fragile infrastructure

In frank terms the consensus was that our schools are full, our roads are at capacity and, as has been proved many times over, our drainage is already outworn and inadequate.

However, what ward councillors went to great lengths to point out was that without a plan and agreed numbers that could demonstrate a 15 year land supply, the alternative would be to lose appeal after appeal. We would be faced with rampant development across every area of Garforth, with little or no Town & Country Planning Section 106 monies (the funds paid by builders to develop infrastructure or its replacement, the Community Infrastructure Levy). The council effectively had to negotiate a housing number with the Government and demonstrate it was working towards a site allocation plan. And while it may not guarantee stopping speculative development, it is the only way to ensure it is much less likely to succeed and satisfy the Government Planning Inspector as to land supply.

Some authorities have been unable to agree numbers or site allocations. Below is a link to a cautionary tale from the Yorkshire Post as to what happens when local authorities (in this case Harrogate) can't agree numbers and therefore become prey to speculative development. It's a situation I am determined to avoid here in Leeds; the last thing we want or need is another 'Planning Free For All'. Hence my somewhat reluctant engagement in this process.

<http://m.yorkshirepost.co.uk/news/features/the-great-planning-free-for-all-1-7085137>

### **5) Core Strategy**

In 2014 a Core Strategy was agreed and on the 22 September 2015 a public consultation on site allocations was opened to the public.

**This is my submission and I will attempt to address the issues, challenges, concerns and questions I've been asked by residents, bodies such as Garforth Neighbourhood Planning Forum and my own.**

#### **Land Availability in Outer South East**

#### **Concerns of Garforth Neighbourhood Planning Forum & Local Ward Members**

I will discuss all the land put forward in the initial round of consultation in 2013/14 and offer observations regarding the challenges facing the community. Firstly however, I have received a query from the Garforth Neighbourhood Planning Forum (GNPF), which I am very happy to raise on its behalf.

Below are extracts from GNPF's letter to my ward colleagues and me:

**Garforth Neighbourhood Planning Forum  
14th September 2015**

**Dear Mark,**

**We contacted you recently to ask for an explanation why areas GSN and GSQ in the Garforth & Swillington ward were included in the Leeds East HMCA.**

**GSN and GSQ are legally part of the Garforth and Swillington ward  
Both areas are east of the M1 which is a 'natural' boundary between Leeds East and Outer South East (OSE) and therefore should fall into the OSE HMCA.**

**Both areas have more in common with the communities of the OSE HMCA than they do with the suburban Leeds East HMCA.**

**When calculating greenspace in the OSE HMCA, the planners have included area GSN, when calculating housing they have left it out, again without any convincing explanation.**

**Leeds East HMCA was then credited with 3,328 houses from the Aire Valley Skelton Gate, this is the GSN land in question. (Leeds Site Allocation Plan Publication draft June 2015 section 3 para 3.3.7)**

I have explained how HMCAs were established, above.

Firstly, there is no Government requirement for HMCA boundaries to correspond with ward or voting areas. Hence there is no reason why parts of the same ward should not fall into different HMCAs.

The HMCA boundaries were embedded in the Core Strategy and provide the basis for breaking down the overall housing requirement. The update of the SHMA for the Core Strategy Examination (2013) did not review the HMCAs, but concentrated on updating the latest evidence of housing need.

The plan was considered by the Government's appointed Inspector at the Public Inquiry and the boundaries of the HMCAs were not altered through that process. Therefore they are now part of the plan adopted by the Council in November 2014, despite local members voicing concerns. I want to make it clear that I believe we were effectively coerced by a Government intent on pushing the council through a fundamentally flawed process. And consequently, I think councils were equally quick to push through a Core Strategy with agreed numbers to avoid, as I outlined in my introduction, exposing Leeds to the same nightmare scenario as Harrogate and other areas. The Site Allocations plan therefore must work to the boundaries in the Core Strategy.

I supported the Core Strategy as speed was of the essence. If any application on any greenbelt or sensitive land had been forthcoming, the applicant/developer would have secured permission due to the precedent I outlined in my introduction. Indeed, I had already fended off speculative development proposals from Harron, Persimmon, Redrow and a local landowner, because they were premature ahead of the Core Strategy and site allocation processes.

It must be said that even if the HMCA boundaries had been different, it would have not necessarily affected site allocations, because the same numbers – 16,000 dwellings combined - have to be accommodated on the same city footprint. Having said that, would it have affected the distribution of the Community Infrastructure Levy (CIL), assuming development happens? I don't know the answer to that, as the land is so detached from the footprint of Garforth. But I do think the inclusion of certain voting areas in the East Leeds HMCA is flawed and I am raising the following questions:

- As the current Core Strategy places land outside the OSE HMCA, but within my ward boundary, in Leeds East HMCA, could OSE HMCA qualify for the appropriate credit for the numbers which sit within the Leeds East HMCA to offset against our targets?
- If this land was in OSE HMCA, could this have been put forward in Phase 1 to take pressure off more sensitive sites adjacent to existing settlements such as Garforth?
- Do OSE HMCA and Leeds East HMCA really expect to develop in these numbers in these timescales? Indeed, are the housing projections accurate?

The minutes for Item 33 of the Development Plan Panel on 19th May 2015 include the following:

**RESOLVED - iii) to support a selective review of the Core Strategy within 3 years of its Adoption and following subsequent household projections, which will better reflect demographic trends of a recovering economy.**

The first part of this will be a review of population/household forecasts, through a new Strategic Housing Market Assessment (SHMA), to compare to the Core Strategy target. Depending on the outcome, the Council must then decide whether to change the plan and, if so, how, as a consequence of changing the overall target.

Changes to the statutory plan can only be made through the same process as the original Core Strategy, including public examination. And I think the Core Strategy must be reviewed at the earliest opportunity. We need to use revised population/household forecasts as the baseline and reassess land supply, the HMCA boundaries, house price data, impact on CIL and revised/reduced housing growth figures.

To be clear: I think the questions from both GNPf and myself are worth revisiting by a full or partial review of the Core Strategy. I would further ask that the development of any land in Outer South East is not progressed until these queries can be thoroughly addressed.

I have also asked a question of the MP for Elmet & Rothwell, whose constituency covers this land, via the GNPF meeting, which he attended on 21 September 2015:

- Would he support the return to a locally led sequential brownfield policy that was driven by local councils and free from being overturned on appeal? And would he also insist that existing permissions upon brownfield sites were developed first? To date this has gone without, in his role as the legislator, an adequate reply.

#### **Other land in Outer South East under consideration**

I think it is also prudent to offer a view on all the other land that was put forward for consideration by developers, landowners and other parties in the last round of site allocations. I want to comment on the progress of these and the challenges they present in terms of development. Therefore I have advised both Swillington and Great & Little Preston Parish Councils of the need to consult on this exercise and will be speaking to them with the offer to formulate their responses.

However I will be commenting on behalf of residents on one pocket of land in Great Preston, under **Appendix A** of this submission.

#### **Outer South East HMCA**

The Outer South East map is part of the consultation on site allocations which began on 22 September. I will initially comment on what isn't in the plan; in an area like Garforth that is of equal, if not more, importance than what remains.

Firstly, following the feedback in 2013, which I have covered above, I am satisfied and pleased that many of the very sensitive sites have been excluded from this phase of the consultation process. The following have been removed:

- **Greenfield land on the A642 Wakefield Road and the A63 Selby Road**

Traffic and flooding issues would have made development untenable. A section on Se by Road will remain as Safeguarded Land / Protected Areas of Search (PAS). This is 'reserve land' for consideration for development after the end of the plan period of the current development plan. However, increased flood risk at the Old George Roundabout, where the A63 crosses the A642, has been avoided and I hope Garforth can demonstrate land supply that means PAS land is never required in future expansion plans.

- **Land on the right and left hand sides of Barwick Road**

Had this land north of the railway been developed, the junction at Town End could not have coped with more traffic entering Garforth via a single lane railway bridge road.

- **Smaller sites / In-fill locations**

The most sensitive site was to the rear of the Squash & Leisure Club. The impact on existing roads, estate access and the huge extra burden on an already old and overburdened drainage system would have been disastrous.

- **Site 1232A, Cedar Ridge / Ridge Road**

In 2013 a document called 'Your Garforth' appeared as an online publication. It presented a plan for houses way in excess of agreed targets for Outer South East. It proposed to build adjacent to houses in East Garforth, along with a claim, subsequently refuted by the SPTA (School Partnership Trust Academies), that negotiations were in place for new primary and secondary school provision. None of this was with the input, consultation or approval of locally elected members.

- **Town End**

Garforth ward members worked very hard to demonstrate that the existing brownfield site on the A642 (commonly known as the MIAMI site) meant sensitive areas like Town End, be they brown or green sites, should not be developed. Brownfield should always be used first, but only where possible and sustainable.

Finally, I believe we should make every possible effort to maintain the unique nature of our towns and villages across Leeds, and the slow approach towards Inner East Leeds development would have been at odds with that. I fully expect those parties with vested interests around the development of the sites I have outlined, to take part in this process to push for their re-inclusion. But the case we made in 2013/14 remains strong and I hope Leeds City Council and the Examiner agree. I would urge them to resist all arguments for re-inclusion.

And so we move on to land which is in the plan. Let me first say that I would not support the formal adoption of any land until the queries and anomalies raised earlier in this submission are fully explored, with the possible re-examination of part of the Core Strategy. And I hope this is welcomed by the GNPF.

#### **I will now discuss 1232B.**

1232B is geographically placed at the site commonly known as Peckfield. To the left of Selby Road when traveling out of Garforth, it runs adjacent to Ridge Road as far north as the railway line.

At face value 1232B looks favourable. But in terms of its location, size and infrastructure needs, it doesn't so much solve a problem as open up a whole set of new ones.

Firstly, it is my understanding that the mineral rights below this parcel of land belong to a third party who is not the land owner. I am also led to believe that this third party is not prepared to relinquish those rights. Clearly this would need to be fully explored before a serious examination of the site could be progressed.

Whilst it is the only significant land available in the current consultation, and again I hope the promised re-examination of the Core Strategy would alter that, it simply cannot be considered in isolation. It is absolutely vital that the broader infrastructure requirements and, most importantly, the needs of the existing community are taken into account and fully met. It therefore seems premature to touch further on the potential of 1232B without a proper examination of those

requirements, anomalies and outstanding issues.

### **Highways Provision**

Garforth is effectively an island when it comes to the movement of traffic. At present, the A63 carries 21,000 pieces of traffic movement a day. When there are major works, such as on the A642 in 2014, we are often gridlocked at key times. The triangular formation of the A642/A63/Micklefield Ridge Road is already at saturation point.

ANY new development must come with a scheme to alleviate the extra traffic. And it must be delivered before or in tandem with development.

Housing growth in East Leeds has the prerequisite that a highways infrastructure, the ELOR (East Leeds Orbital Ring Road), is delivered first. Towns of our size, such as Wetherby and Otley, have by-passes. And I believe Garforth needs, and should accept, no less. A by-pass could be funded via the West Yorkshire Combined Authority Traffic Fund and recouped with a roof tax against each house built, until delivered.

My ward colleagues and I commissioned a piece of work to see what a southern relief road would look like. The Highways Department has stated its position as follows:

“You should note that this is an outline feasibility draft and that any progression of this scheme is entirely subject to the progression of the proposed east of Garforth housing allocation and a comprehensive transport study for the site. If it is subsequently determined that the scheme is required it would be subject to a full public consultation at the appropriate time.”

My view is that the public consultation should take place, and ensuing funding be secured, before the matter of any housing is settled. To be clear, our roads in their current configuration simply cannot support an increase in volume.

Again, I trust the GNPF would support this objective.

### **The Role of Neighbourhood Planning and proposed Town Council for Garforth**

I have long opposed the adoption of a Town Council. I am a natural believer in less, not more, tiers of government, and would call into question yet more local taxation in the form of a precept.

Additionally, I've always struggled to see where a Town Council would add value in Garforth. We already have Garforth Community Association, Firthfields Community Association, which runs our municipal buildings on behalf of LCC, Garforth & District Lions, which runs our key events, and a whole range of community groups that add so much value locally. So I still struggle to see how the current arrangements could actually be improved upon. I also have concerns how a Town Council would fit into these well-established structures.

However in light of the current situation facing us, I do accept the time has come to consider again, with key questions and strict caveats attached. I will outline why.

Garforth faces a problem which, the Dept for Communities & Local Government tells me is virtually unique.

Apart from a tiny sliver of land adjacent to the A63, the huge swathe of land to the east of Garforth, whilst in my ward, is currently within the Parish of Aberford. That means the GNPF, or any future Town Council, has no say in scoping and shaping the land because parishes have the hierarchy of control.

So the worst case scenario would mean Garforth eventually having housing with no local input regarding demand or infrastructure and, crucially, no CIL coming back to the community.

The highest CIL rate in our area is £45 per square metre. (See table, below, the charges are index linked so may increase or decrease slightly from 2016.)

Garforth must address this situation as a matter of urgency. If the GNPF is prepared to consider a tandem referendum on both the formation of a Town Council AND Garforth being removed from Aberford Parish, I could, with some hesitation, support that. It would mean Garforth would benefit directly from the CIL, with a % coming directly back to the town and enable us to scope and shape our own community's needs.

I have been meeting with Aberford Parish Council since 2013, and their understanding of the uniqueness of our situation has been to their huge credit. Following a dialogue with my colleagues and me, they set their own neighbour planning designated area to their side of the motorway and have no interest in land to the Garforth side, other than to protect the interests of our residents from whom they collect a precept. But as I've illustrated, the whole situation is flawed without urgent intervention by the GNPF, along the lines I've outlined.

In 2013 I helped initiate the concept of a Neighbourhood Planning Forum for Garforth. I support the principle because it is community driven and the Department for Communities & Local Government indicated that the scope and shaping of expanding communities could be developed through this process. So eventually the fundamental needs around infrastructure, which may follow with development, will go to public referendum in the form of a Neighbourhood Plan, produced by the GNPF.

What concerns me, is that if we don't iron out the anomalies I have outlined regarding Aberford Parish, Garforth could lose out enormously. I know the GNPF is aware of this and is addressing it through the call to reconsider a Town Council but, again, until these difficult issues are tackled I strongly urge that no development is brought forward in Garforth. It is frankly unthinkable for development to proceed without both CIL and huge community input around infrastructure.

### **Health and Associated Infrastructure**

Needs and aspirations have changed since Garforth was developed from a village to the largest private housing estate in Europe, as it was for a time in the 1960s/1970s, to our present modern town.

Our one primary health care facility is under threat of closure and yet I'd argue we need more provision to satisfy a burgeoning community. We need more GPs, Dental Surgeries and community green space to promote health and well-being. And therefore the GNPF should now be engaged in advanced dialogue with the Clinical Commissioning Group to map out what we require. CIL must be paid at the highest rate possible per metre squared, (see the table above). And what's more, these requirements should be added to our infrastructure needs and funded by developers. I see no reason why developers should not be obligated to provide the wider, essential infrastructure requirements and projects for our community.

### **Brownfield/Greenfield Split**

On agreeing the Core Strategy, the Government Inspector further approved a brownfield/greenfield split. The split is 65% brownfield ("previously developed land") and 35% greenfield for the first 5 years, with 55% brownfield and 45% greenfield after this. It is Policy H1 of the Core Strategy.

My demand would be this: if developers are not proposing in these ratios, the Council should use policy H1 to look critically at greenfield applications until the target is being met. As ever, developers may try to appeal against refusals, but by having a clear policy we should be in the best position to try and ensure the Core Strategy policies are followed.

My other concern is around quotas. If, for instance, a developer applies to deliver 35 houses on OSE greenfield, where would the other 65 houses be developed? OSE cannot be expected to accept the other 65 houses purely to fulfil the quota and yet nor should we take housing on our greenfield land, whilst another area acquires the quota of brownfield. That would be a discriminating anomaly and, frankly, a flaw in a policy which is close to unworkable.

### **Greenspace**

Garforth, whilst surrounded by a semi-rural setting, has a distinct lack of community-use greenspace.

If 1232B is brought forward in the final process for public examination, I will be asking for the following assurances:

- a clear division from the existing settlement
- the landowners at 1232B, collectively or individually, forfeit land to create the kind of green corridor we would wish to see
- walkways and linkages to Garforth retain the clear separation required to maintain the unique nature of our communities

I would also be pushing for the provision and incorporation of increased sports/recreation/well-being space. Whilst these are matters for the GNPF to progress, in Garforth's proposed Neighbourhood Plan, I am fully aware of the need for greater provision for our many burgeoning sporting clubs.

Indeed I have been informed by Garforth Rangers that they have already been approached by the landowner at 1232A. Here is their statement:

***As you know we have recently been approached by a PR firm that is looking after a proposed development of houses in Garforth on behalf of Chris Makin on an area of land that I understand is designated 1232A. Whilst Garforth Rangers will not comment on the merits or otherwise of any house building in Garforth we are acutely aware of the lack of sporting facilities in Garforth, particularly provision that can be used for training***

***The club is already constrained and limited in how much more it can grow, but demand is increasing and to cater for this we are already playing football and using training facilities outside of Garforth. As such we welcome any suggestions for additional facilities that may be proposed, provided of course that that they are delivered in a sustainable way and believe that new facilities would be a must should any further development go ahead, be that at the land designated 1232A or 1232b or anywhere else in Garforth. Ultimately, we believe that new facilities together with a regenerated Ash Lane that we have proposed can only be of long term benefit to the whole of Garforth.***

There can be no development in Garforth without a clear vision for how recreation and greenspace is delivered. We cannot repeat the mistakes of the past.

I hope to liaise with the GNPF to move progress on this issue.

### **Flooding**

Since June 2007 Garforth has had a series of significant flooding incidents.

Although climate change is fundamentally an issue, the reality is that Garforth floods for many complex reasons. Summarised as follows:

- Historical maps show that the modern settlement sits on many formerly open culverts which have been encased and covered in the course of decades of over-development.
- The existing drainage on Main Street and to the west is damaged, outworn and inadequately mapped.
- The drainage system to the east is at capacity.

I've worked closely with the Garforth Flood Group since its inception. This is the Group's response:

***"The situation in Garforth, in respect of flooding, is worsening year on year with multiple internal flooding incidents in both 2014 and 2015, property incursion and near misses almost every year since 2007 and sporadic incidents since the 1980s. This situation is the result of several sets of circumstances i) Global Warming and Climate Change proceeding at a faster than natural rate due to the profligate way humans have treated the planet. ii) Multiple layers of clay underlying the town. iii) Indiscriminate tapping into the existing system every time there is a newbuild, of which there has been a terrific amount since the 1950s. iv) An ageing drainage/sewerage system which regularly collapses and is inadequate for the intensity and volume of rain we now experience. 5) Combined sewers capable of spewing raw sewage into people's homes during a storm. 6) Inadequate regular maintenance of the infrastructure by the asset holders.***

***GFSG appreciates that housing is needed and that we must accept our share but that must be seen to be fairly distributed. Newbuild must stand alone in terms of sewerage and surface water drainage must not feed into the existing system at all. Surface water should be stored on site using Sustainable Urban Drainage methods. Sewage should be carried in closed sewage pipes completely independently of the combined sewers serving Garforth. Newbuild should incorporate green space and vegetation to soak up, use and slow rainwater in an effort to prevent systems from surcharging.***

***Much needed new housing in the Garforth area must not threaten the wellbeing of existing residents in any way. The current situation is already having a deleterious effect on health, prices and house sales even for properties that have not actually been flooded"***

I am in complete agreement. Any housing, on any site and in any location, MUST stand alone and have new, independent drainage systems, which have no access to the current ones. Therefore it is absolutely imperative that any proposed development on/around/contiguous with existing housing and infrastructure, satisfies vigorous testing before being progressed via public inquiry.

Below is a link to the report on Garforth's flooding issues, which makes sobering reading. It adds weight to the arguments I've laid out above, that Garforth cannot be subjected to housing which accesses existing drainage or has a negative impact on flooding.

The link is now available on the website at <http://www.leeds.gov.uk/residents/Pages/FloodRiskManagement.aspx>, you then need to look in "Documents" on the left of the page.

### **Location**

Should (and I stress should), after all the caveats I've requested, including a review of the Core Strategy, the evidence take us back to 1232B, we must address the questions around the geographic location of any development.

I oppose any development which would adjoin the existing settlement. There must be a large, clearly defined geographic area of separation between Garforth and what would be, effectively, a new satellite neighbourhood. Further land must remain out of any development to the west of Micklefield; this would, if added back, mean the two communities become contiguous at the Ridge Road. That would be unacceptable.

Communities must retain the uniqueness which sets Leeds and its satellite towns and villages apart from, say, the urban sprawl of Greater Manchester.

### **What housing does Garforth need?**

Between 1965 and the mid 1970s Garforth saw a huge housing expansion programme, which at the time was the largest private housing development in Europe. So the concept of housing growth is not a new one. And many newcomers to the area around that time now have children living locally. We are currently faced with a situation where the third generation, through rapidly rising house prices, will not be able to reside in their own community. Despite the many reservations I have outlined, and the numerous anomalies and hurdles to overcome, I am prepared to say quite openly that I believe Garforth will need more housing going forward. The real questions are who develops it, why and what should it look like.

The term affordable housing is frankly worthless. The history of developers browbeating local authorities and driving down their commitments to affordable housing, means I have no faith in this whatsoever.

Garforth has an ageing community, which should be able to access quality sheltered housing delivered by the local authority. There should also be, if Garforth is to take housing in large numbers, the power for local authorities to build housing which allows up and coming generations to live here.

This actually makes economic sense. Many people live in private rented accommodation, with extortionate rents which often have to be topped up with Housing Benefit. So the strain on the public purse is already there. We should be

insisting that, if we are to take housing in great numbers, it should not be the usual mix of four and five bedroom detached houses designed with no other aim than to line developers' pockets. Despite crushing cuts, LCC is blue chip rated as a borrower. It can actually borrow money from the market at 0.5 of 1%, a better rate than can be achieved by HM Treasury. Furthermore, the money markets would willingly invest in a social housing scheme, which would generate income for the local authority over decades.

I believe, and I hope the GNPF will back me on this, that local authorities and not volume house builders should dictate the nature of our housing stock. And we should call upon our MP and the incumbent government to insist that any development is for social good and the long term sustainability of communities. This should give local authorities the ability to identify what housing need looks like, the necessary compulsory purchase order powers to ensure we get the housing we want and where we want it, whilst accepting that every area has to take its fair share. I call upon our MP to engage in this principle and assist me, as an elected member, in progressing what the public is telling me: we desperately need social, decent housing provision, fitted to the highest possible environmental standards, to create a sustainable social housing stock for the future. And furthermore, for any new social housing that comes forward we should remove right to buy.

## **Appendix A**

### **40 houses at the rear of Hemishor Drive, St. Aidans Estate**

Firstly, ward members were not consulted on the plan to site 40 houses on the land to the rear of Hemishor Drive. And had we been, we would not have supported it. This land is now in the site allocation process under consultation. Whilst this land comes under Great and Little Preston Parish Council, and is therefore a matter for them to lead on in terms of the consultation, I do not feel this land is suitable for development and would push for its early removal.

LCC Highways Dept. appears to be of the opinion that there is sufficient access onto Bury Lane, but this is not the issue. The estate itself consists of extremely narrow roads and because of its unique nature, where houses are raised on one side of the road and sunk at other, this inevitably leads to heavy on street parking. Any further traffic movement at this location would be utter folly and have a significant impact on emergency and service vehicles accessing the estate. I simply cannot believe anybody thinks this is a good idea and I know the Parish Council will be making its own submission along these lines.

## **Conclusions**

Whilst I accept in the here and now that there is a need for a Core Strategy and a site allocation process to fend off rampant and unsustainable development, and I stand by the early implementation of the Core Strategy, there are key questions which must be dealt with before any development is brought forward:

- As the GNPF has raised, is the HMCA fit for purpose?
- Is it detrimental to Garforth and OSE land allocations and can this be reviewed at the earliest opportunity.
- Before any development can take place the highway infrastructure must be addressed through a full public consultation, with a commitment to providing the necessary infrastructure ahead of development.
- Any settlement developed must be stand alone to maintain the unique nature of our towns and villages, whilst ensuring there is no negative impact on the flooding situation.
- Infrastructure around green space provision and broader community requirements, such as schools and healthcare, must be addressed.
- There should be an urgent review regarding the need for a Town Council, to ensure Garforth doesn't lose out on CIL or the the opportunity to scope and shape new communities. But this should be delivered in tandem with a referendum for any town council boundary, to assume respons bility for land that current lays within Aberford parish.
- Any development should be environmentally sustainable and address social need driven by the local authority and not the volume house builders.

As a ward member I am very happy to work with the the council and any external partner to deliver these objectives, but I must make it clear that I see none of the above as being negotiable. They must all be satisfied before a brick is laid. And in the medium term, whilst I see the need to adopt a Core Strategy, I am struggling to see how this can be delivered.

I hope this submission is of use.

**Councillor Mark Dobson  
Garforth and Swillington Ward**

Sent from my iPhone