

**From:**  
**To:** [Site Allocations Plan](#)  
**Subject:** PDE01293\_HG 3 - 1 (4043) Ings Lane, Guiseley  
**Date:** 15 November 2015 17:30:16

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Hello

My name is Hayley Mason and I live at 46 Ashtofts Mount, Guiseley, Leeds, LS20 9DB and my comments are relating to The Leeds Site Allocation Plan. The section of the plan I will be commenting on is HG3 - 1 (4034) Ings Lane, Guiseley. I do not agree with the proposed use of this site for housing as I do not consider the Leeds Site Allocation Plan to be sound. This is because it does not meet three areas of soundness:

- 1) The plan is not justified.
- 2) The plan is not positively prepared.
- 3) The plan is not effective.

**1) The Plan is not justified:**

- Leeds have not done a comprehensive Green Belt review as was asked by the inspector of the Core Strategy. They have only reviewed Green Belt Sites which were selected for development.
- They have not involved communities in the drawing up of their plans.
- For each site Leeds have done a sustainability appraisal where they have researched how each will impact on the community and how the new residents will access amenities. These sustainability appraisals did not include any transport reviews or ecology reports which are the two main points which many people are concerned about, they also contain mistakes due to lack of research.

**2) The Plan is not positively prepared:**

- There are not enough facilities to cope with the number of houses proposed in Aireborough.
- The A65 is congested.
- No real assessment has been done on the access to each site or the extra traffic it will create.
- Access to the Ings are very limited, the field closest to Netherfield Road is accessed through a single farm gate which is adjacent to a well established and mature Hawthorn hedge which is populated by a wide variety of birds. The field further along Ings Lane is accessed by a gate adjacent to the derelict farm buildings, both of these access points are hugely limited for any significant traffic flow. Ings Lane is an unclassified road, which, because of current occupation and traffic flow is reduced to a single land carriageway for much of its length, this would cause significant problems for any developers vehicles and for future residents. The access close to Netherfield Road would also create significant risks as many cars sweep down into Ings Lane from Chevin End at significant speed. Any development would add to pressure on the already overloaded A65 to Netherfield Road and Chevin End Road and adjacent roads fed by these.
- Guiseley Cemetery is immediately above the site, and there could be issues about drainage from there. Also issues about disturbing the cemetery both through the development stage and when occupied, cemeteries are obviously sites that need to be given space and freedom to allow people peace and tranquility, and should be a distance from a large housing estate and the disturbance caused during its development.
- Doctors and dentists can only just cope.
- For each site Leeds have assessed what infrastructure is present now, i.e. how far is the site away from a school, bus stop, train station, doctor's surgery and made no recommendations as to what needs to be put in place to accommodate

the new households.

- Leeds have not done a housing needs survey, so it is possible that developers will plan to build larger houses - this is for obvious reasons. The ANDF emerging housing survey suggests the area needs affordable houses for first time buyers and those suitable for couples downsizing.
- Leeds housing target of 70,000 has been described as aspirational. Revised figures suggest a much lower figure but LCC will not change their target. A lower figure would reduce the amount of Green Belt required to meet the plan.

### **3) The Plan is not effective:**

- It would appear that Leeds and Bradford are not collaborating when planning where housing is planned in terms of roads and traffic congestion. Developments in Menston, Burley and Apperley Bridge will all impact on the A65 but not enough consideration has given to this.

Furthermore The Ings Site specifically meets five Green Belt purposes, these are:

1. To check the unrestricted sprawl of large built-up areas.
2. To prevent neighbouring towns from merging into one another.
3. To assist in safeguarding the countryside from encroachment.
4. To preserve the setting and special character of historic towns.
5. To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

There are several facts which have been ignored in the site specific survey:

1. The Ings form a natural drainage basin from the south/south west of the Chevin absorbing significant water running off the Chevin, it is a natural sink site where much of the water drains away, it is the only site on this side of the Chevin that does this, were it to be developed it is questionable as to where the water would go.
2. The Ings also forms the 'green buffer' between Guiseley and Menston, if this land was developed the two communities would merge. As would Aireborough and Wharfedale.
3. Mire Beck runs through the Ings, the Beck teams with wildlife, amphibious, avian and mammals which clearly find the beck a rich natural resource. Any development has the potential of compromising the quality and natural integrity of the beck which feeds into the Wharfe via Ellar Ghyll. Pollution and contamination may well increase.
4. The wetland nature area of this site means a wide range of birds visit the Ings throughout the year. Lapwings and Curlews winter on the Ings along with migrating Redwing and Fieldfare. The Lapwings and Curlew also breed on the Ings. Little Owl, Tawny Owl and Barn Owl hunt and feed on the Ings. Heron and Oystercatchers feed on the Ings and in Mire beck, during the summer, Swallows, Swifts and House Martins feed on the insects generated by the wetland. The Ings is visited by a huge range of resident and migratory birds through the year. A thorough ecology assessment should be undertaken to assess the range and diversity of amphibian and mammalian wildlife that occupy the Ings, as this is an area with very limited contact it is likely that these are significant and diverse. The Ings are home to a significant group of rabbits, visited by Roe deer regularly and because of the proliferation of Owls, Raptors and wading birds, it is obviously home to a significant population of smaller mammals and amphibians.

Guiseley Ings are a green space of significant ecological and community value. They are a natural wetland and should be classed as a heritage landscape as there are no other low lying wetlands of this type or quality in the area. A spring rises in the middle of the Ings which feeds the wetland along with considerable

water runoff from the Chevin - the area is a glacial valley that, unusually has no river, the current landowners tried to culvert this spring in 2013 with limited success.

Crucially, the plan is not legally compliant:

### **1. Leeds City Council have not fulfilled their duty of Community involvement.**

- LCC's document of community involvement was written in 2007. It is out of date and does not include their duty to collaborate with forums and parish/town councils designated to draw up neighbourhood plans. As a member of the Guiseley community I have not been consulted fully in the whole site allocation process.
- I was not told of the eight week consultation period, or the fact that LCC were holding a drop in meeting in Guiseley by LCC.
- No genuine attempt has been made to engage with the community or to help them understand what is being proposed or how to respond to the consultation.
- There was one advert in Aireborough on a phone box in Guiseley which was taken down three weeks into the consultation.
- No where do any documents state that 90% of Aireborough's sites are on Green Belt.
- Documents refer to Green Belt as Greenfield which is misleading and suggests that land has already lost its Green Belt status.
- A fully comprehensive Green Belt review has not been carried out as specified by the inspector at the Core Strategy hearing.

### **2. Leeds City Council have not fulfilled their Duty to Co-operate.**

1. In their background paper of September 2015, one meeting is recorded with City of Bradford Council on 6th March.
2. How can one meeting have discussed all of the points on which they should co-operate? Minutes for this meeting have not been forthcoming, even though they have been requested.
3. In the Leeds Local Plan, a comprehensive review of Green Belt should have taken place alongside Bradford. Many of our sites have boundaries with Bradford. Aireborough is a fringe area. There is no evidence that this has taken place.

Solutions on how to make the Leeds Plan sound.

1. The Leeds housing target should be reduced from 70,000 to 44,000 - in line with ONS data.
2. The plan must abide by the National Planning Policy Framework.
3. The plan must be drawn up again, with a better methodology, for example using Brownfield sites first.
4. Build closer to areas with better infrastructure.
5. Build closer to where the majority of jobs are, e.g. Central Leeds.
6. Carry out a comprehensive Green Belt review.
7. Because of the geology, the area is of Ings Lane is the natural habitat of a significant number of species - some of which are endangered. Although there are no rights of way through the Ings itself, a great asset to the area would be to regenerate the long distance footpaths that surround the Ings so that they form part of a nature trail through the North West Leeds Country Park connecting it to other areas. Also, because of the biodiversity of the site, it would be an ideal site to place viewing hides. Such a development would be a great community asset for wellbeing, for education for local schools and to help the local economy by attracting visitors. This would also be in keeping with the historic and landscape of this area.
8. Communities must be genuinely engaged with.
9. Full co-operation with Bradford Council.

I would like to be present at the inspector's hearing and please send acknowledgement of my response. I would also appreciate if it if I could be informed of the submission of the plan for public examination and/or adoption.

Yours sincerely,

Hayley Mason