

From:
To: [Site Allocations Plan](#)
Subject: PDE01519_Leeds Housing Allocations
Date: 15 November 2015 10:04:43

Hi,

Please see my comments below with regards to site allocations in the Aireborough region. I have aimed to highlight where and why I consider the plans to have failed the soundness tests, NPPF and legal compliance. In addition I feel they fall far short of the strategy and vision laid out in the Leeds Site Allocations booklet.

I will start with some general comments, which cover all the sites, and then give specific site references for certain comments.

Firstly some background: I have lived in Guiseley for 7 years, with my husband and two children (aged 9 and 7). Over that time have seen a marked decrease in the quality of live in the town. I now find it much more difficult to get a doctor's appointment, commuter trains into Leeds are ridiculously crowded, road congestion on the A65 has gone from bad to worse, school places have been under considerable strain and green spaces are disappearing. Additionally Guiseley High School and Aireborough Leisure centre are long overdue extensive investment. Despite the significant number of new houses in Guiseley, investment in infrastructure has been minimal. **(Soundness test – positively prepared, effective)**

These changes have all resulted in Guiseley becoming a less attractive place to live, and are a direct result of the large number of houses built in and around Guiseley over this period of time. In comparison to other local townships Guiseley is rapidly losing it's identity as a separate town, and becoming subsumed as a commuter suburb of Leeds. It's community and historic identity is being eroded as more people move here to live, but work in Leeds; and as green spaces and historic landmarks are lost to development. Given that population growth in Guiseley is primarily driven by commuters who work in Leeds I would strongly challenge the need for any additional housing in Guiseley. Most people would prefer to live close to their place of work, and if additional suitable housing was created in Leeds this would surely be more sustainable. As mentioned above the increase of commuters has already stretched transport links to breaking point. **(Soundness test – positively prepared, justified, consistent with national policy, effective. Problems with congestion and transport infrastructure also fail to meet the sustainable transport criteria of the NPPF, which would be better met by increasing housing in the city centre rather than the commuter belt. In addition this goes against the NPPF guidelines on promoting healthy communities.)**

Additional housing on this scale will also require the construction of a new school in Guiseley. The creation of two new primaries from the previous infants and juniors has created some additional school places, but this will be insufficient should further houses

be built. **(Soundness test – positively prepared, effective. In addition this goes against the NPPF guidelines on promoting healthy communities.)**

There are far fewer community groups, events and organisations in Guiseley compared to other nearby towns. While more houses are being build there are no additional jobs, so the percentage of population working locally decreases and people do not have the sense of community involvement which comes from living and working together. The existence of the retail outlets has meant a lessening of foot traffic on the high street, which also reduces the sense of shared community. **(Soundness test – positively prepared. In addition this goes against the NPPF guidelines on promoting healthy communities.)**

From a wide circle of acquaintance in Guiseley I can honestly say that not one person is in favour of any further development, especially not on greenbelt, which is incredibly precious to local residents. Previous developments have pushed ahead in the teeth of very strong local opposition. It is certainly the case that any genuine consultation with local groups and residents would not lead to this plan being adopted. Previously applications and plans have also all failed this test – providing lip service to genuine consultation, without actually taking any alternative views into account. While I hope this will be different, I do not have much faith in the current system, which appears to privilege the ability of developers to make their 20% profit over and above any other consideration. **(Soundness test – justified; and Legal compliance. In addition this goes against the NPPF guidelines on promoting healthy communities.)**

Furthermore the way in which the consultation has been carried out excludes the majority of the population from actually participating. Firstly the majority of people I have mentioned the consultation to have been unaware of its existence. For those who do want to find out more it is difficult to do so: the drop-in session I attended on 23/9 was so full that it was impossible to come away with any clear idea of the plans. I could not get close enough to any of the council representatives to hear what they were saying, and the plans themselves were not clear enough to provide information without a narrative to accompany them. This is also a problem with the plans available in the libraries – an overview / narrative is required to decipher them. In addition the process for submitting comments is so complex that most people will be put off from even trying. An extraordinarily high level of education is required to wade through the plans, guidance and forms; in addition to internet access. It is then necessary to cross reference comments to the soundness tests and legislation. The fact that responses are required for each site individually also makes it unduly onerous to respond. All of this just further creates the impression that this is a consultation in name only, and that genuine views are being neither sought nor listened to. **(Legal compliance. In addition this goes against the NPPF guidelines on promoting healthy communities.)** By no stretch of the imagination can this allocation be said to ‘reflect the vision and aspirations of local communities’ (NPPF para 150), or to have featured ‘Early and meaningful engagement and collaboration with neighbourhoods, local organisations’ (para 155). **(Legal**

compliance)

My personal experience of housing in Guiseley is that it also has to be looked at in the context of decisions made in Menston. While this is in Bradford any comprehensive housing review has to take this into consideration as Menston uses the same transport and schools infrastructure as Guiseley. This also applies to Yeadon and Horsforth on the other side – although as these areas are also part of Leeds that is slightly easier to do. Thus far the impression given is that these considerations have not been taken into account – the High Royds development, and in particular the impact on school places, being a clear example of failure to communicate between Leeds and Bradford.

(Soundness test – positively prepared, effective).

The core strategy, which has determined the volume of new housing required, has not sufficiently made its case. I am aware it is not the subject of this consultation, but nevertheless underpins the assumption that new housing is de facto required. I am not convinced this is the case, as there appeared to be a number of flaws in the core strategy (not least it's basis in outdated and inaccurate ONS figures from 2008). This impacts on the Justified test, as the principles underpinning the plan are, to my mind, fundamentally unjustified. **(Soundness test – justified)**

I do think there may be a need for affordable housing for young people: my neighbour's children in their early twenties have both had to leave Guiseley to find affordable housing in which to raise families. I recognise that this is a national problem, and that there are no easy solutions. However, it does not seem to me that recent development in Guiseley has in any way addressed this need. All the new houses that I am aware of have been family homes with high price tags. I realise that affordability for young people is a difficult, national, problem – but just the fact of building more houses alone will not help. A better and more targeted approach is required – possibly including social housing.

(Soundness test – positively prepared)

The existence of greenbelt land in and around Guiseley is crucial for the quality of life of residents, and the historic and community viability of Guiseley as a township. Like the other local townships Guiseley exists as a distinct historic town, separated from Leeds and nearby towns by green space. The more this green space is eroded across the whole of NW Leeds the more the identity, community and distinctiveness of the towns are lost. It is impossible to overstate the value of this green space, which everyone I know uses for leisure, relaxation and sporting pursuits. It is the defining part of the appeal of Aireborough, especially for people with young families. We regularly use the fields, woods and hills surrounding Guiseley for a range of activities: walking, climbing, paddling, cycling to name but a few. In common with all other local residents I would absolutely, 100%, oppose any further development on greenbelt or greenfield land. On any scale, but particularly on the scale proposed, it would immeasurably impact the quality of life, and irrevocably harm our natural environment. I do not believe that the current plan takes into account these views at all. **(Soundness test – positively**

prepared, justified, consistent with national policy, legal compliance. In addition this goes against the NPPF guidelines on promoting healthy communities. These concerns are fundamental to the NPPF section 9; and it is very hard to understand how this guidance can be disregarded so extensively in the Leeds Allocations: para 87 reads: ‘inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances’)

With 93% of the Aireborough houses planned on greenbelt/field sites this is the very antithesis of sustainability. When viable brownfield sites exist elsewhere in Leeds, to build on greenbelt/field in this way is wholly unjustified and should not be considered for a single minute. From an outside perspective it seems incredible, and the only conceivable reason for it to be considered appears to be because to do so is cheaper for developers than building on brownfield sites. It appears that it is developers driving this plan based on their profit margins, not the Council determining what is best for local communities. **(Soundness test – positively prepared, justified, consistent with national policy, legal compliance. In addition this goes against the NPPF guidelines on promoting healthy communities. These concerns are fundamental to the NPPF section 9; and it is very hard to understand how this guidance can be disregarded so extensively in the Leeds Allocations.)**

I have also read the Leeds Housing Plan, and the key point which it is keen to promote are environmental sustainability and social cohesion, they also talk at length about the high value placed on open space. As argued above the plan in Aireborough actively makes these factors worse than the current situation, rather than better. I believe that the details of the plan in Aireborough run counter to the stated aims and policy for Leeds in general.

In terms of specific sites I would like to formally register my opposition to building on: HG2-41, HG2-12, HG2-43, HG2-3, HG2-1, HG3-1, HG2-4, HG2-5: All of these sites are proposed on green land and I object in line with the various points made above. HG2-10, HG2-2: In addition to being built on green land these sites are also of special historic interest to the area and should be retained.