

From:
To: [Site Allocations Plan](#)
Subject: PDE01625_Objection letter
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(For the attention of the Planning Inspector appointed to decide on the soundness of the current Leeds Site Allocations Plan)

Greenbelt

The Leeds SAP document makes clear that 42% of sites allocated across the whole of Leeds are to be on greenbelt/greenfield land. This is directly contrary to the directions in Chapter 9 of the NPPF, which states in para 79:

“The Government attaches great importance to Green Belt. The fundamental aim of greenbelt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.”

In para 80 the NPPF outlines the five purposes of Green Belts:

- To check the unrestricted sprawl of built-up areas;
- To prevent neighbouring towns merging into one another
- To assist in 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.

Paras 81, 82 and 83 of the NPPF make it abundantly clear that Green Belts, once established, should “only be altered in exceptional circumstances” (Para 83). Recently the Government, through the DCLG, has emphasised that the use of Green Belt land to accommodate local authority housing targets does **NOT** constitute exceptional circumstances. Leeds is clearly in contravention of this ruling guidance as it is claiming the housing target as an exceptional circumstance justifying its inclusion of so much Green Belt land in the SAP. This clearly makes the Plan unsound as it is not consistent with national policy.

An example of inconsistency with national policy in Rawdon is site HG2-12 (4254) Woodlands Drive. Para 126 of the NPPF requires local plans to set out a positive strategy for the conservation and enjoyment of the historic environment. The Council has a statutory duty, under the provisions of S72 of the Planning Act (Listed Buildings and Conservation Areas) 1990, to pay special attention to the desirability of preserving character or appearance of Conservation Areas. The Council has not taken account of the fact that this site adjoins the boundary of the Rawdon Cragg Wood Conservation Area and Leeds Council has not carried out any assessment of the harm which the use of this site might cause to the Conservation Area and this is another example of what makes the Plan unsound and inconsistent with National Policy.

Other sites which can be considered unsound on conservation grounds are:

- HG2-1 New Birks Farm, Guiseley
- HG2-2 Wills Gyll, Guiseley
- HG2-5 Coach Road/Park Road, Guiseley
- HG2-9 Land at Victoria Avenue, Yeadon
- HG2-10 Gill Lane, Yeadon

Paras 132, 133 and 134 of the NPPF deal with conservation matters in detail. Furthermore, there are obvious access issues which mitigate against the use of site HG2-12 (4254) for its designated 130 dwellings.

Merging of Communities

The combined use of sites HG2-41, HG2-12, HG3-2 and HG3-3, given that the intervening space consists only of Rawdon Crematorium, would serve to merge Horsforth and Rawdon. Also the combined use of sites HG2-1 New Birks Farm, Guiseley and HG2-2 Wills Gyll, Guiseley will serve to join the townships of Guiseley and Menston. This is inconsistent with both the NPPF and Leeds Core Strategy. Site HG2-41 in particular is a matter for grave concern. This site is in Green Belt, as identified within the Leeds Core Strategy; it was also identified in the Leeds UDP as a 'Special Landscape'. It is also shown in Leeds Core Strategy as 'Strategic Green Infrastructure'.

A further matter of concern regarding site HG2-41 for 777 homes is the chaos that will be caused to traffic congestion on the A65 and the A6120 (the outer ring road). As long ago as December 2011 WARD commissioned a special study by specialist traffic engineers Met Engineers of Hunslet, Leeds on traffic on the A65/A658. Even at that early stage and before a significant number of dwellings were constructed in the area (550 at Riverside and Clariant) and before the current Site Allocation Plan, the A65 was designated by this report as being:

“..... simply unfit for the volume of traffic now using it, whether on weekdays or at weekends, and any further increase in capacity will see further reductions in traffic flow speeds, higher levels of congestion and a continuation of the practice of trying to make more rapid progress by “rat running” onto even less suitable roads through residential areas.” Para 4.11 Met Engineers A65/A658 (Leeds to Burley-in-Wharfedale) Transport Study for Wharfedale and Airedale Review Development (WARD) Revision C, December 2011

As far as WARD is aware there are no significant plans outlined in the Leeds Core Strategy for dealing with the impact of extra traffic which will be generated by the large number of dwellings proposed along the A65. The recently completed Horsforth roundabout does nothing to relieve congestion, there is still queueing in every direction at peak times. The traffic lights simply allow vehicles to ingress and egress the roundabout with a greater degree of safety than was previously experienced before their installation.

Community Consultation

In WARD's opinion there has been inadequate community consultation regarding the SAP. Leeds City Council has made no provision to communicate with the 35% of its population who are not online and, consequently, have no access to the necessary documentation and information which would enable them to make a reasonable response. Unlike the neighbouring authorities of York and Wakefield, Leeds has also failed to record incoming responses to the SAP Consultation on its website. Commentators, therefore, have no means of inspecting incoming responses (during the eight week consultation period) as one may do with planning applications; where responses to these applications are available online during the entire consultation period. When challenged on this matter, a senior

planning officer stated “We have insufficient money to do this” – a remarkable statement coming from a representative of a City wishing to be “the number one City in the UK”. This makes the Plan legally non-compliant and therefore unsound.

Co-operation with Neighbouring Authorities

To WARD’s knowledge there has been inadequate consultation with the neighbouring authority of Bradford. Leeds and Bradford have held one or two meetings in early 2015 (??). This needs confirmation but one or two meetings is hardly meaningful co-operation. It is safe to assume from this that co-operation with the neighbouring authority of Bradford on matters of infrastructure necessary to accommodate proposed developments from both cities is grossly inadequate. This contradicts government instructions detailed in the NPPF (paras 178, 179, 180 and 181).

Housing Density

The Strategic Housing Land Available Assessment Practice Guidance Document (July 2007) from the DCLG suggests approaches which can be taken to estimating the housing potential of each site. It clearly indicates a proposed methodology and a formula for calculating site capacity. This is as follows:

SITE SIZE X DENSITY MULTIPLIER X NET/GROSS RATIO
(HA) (FROM TABLE 1) (FROM TABLE 2)

To understand these tables it is necessary to refer to the full DCLG document.

Using this methodology it can be seen that the average number of dwellings for all the sites in the SAP document is much smaller than the average we should expect had Leeds adhered to the guidance methodology proposed for determining site capacity. This is a good indicator that affordable housing will suffer as sites able to accommodate an average of 35 houses per hectare will be accommodating only 25 – 28 units (developer favoured executive style). Furthermore, had Leeds allowed for the larger average it would not have been necessary to use any Green Belt in the Site Allocations Plan.

Cumulative Effects on Infrastructure

The Site Allocations Plan, apart from proposing a large number of sites for development which contribute to the heritage assets of Leeds, will also have a devastating cumulative effect upon transport and social infrastructure. Para 2.52 of Section 2 of the Plan makes clear “establishing that the site is suitable for use” should be part of a prime consideration for site selection. It is obvious from the Plan that there has been no real evaluation of what impact the inclusion of many sites will have upon the environment. This also makes the Plan unsound as it contravenes section 12 in the NPPF, which in para 126 states:

“Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment”

The principals and policies set out in this section apply to the heritage-related consent regimes for which local planning authorities are responsible under the

Planning Act 1990, as well as to plan-making and decision-taking.

Site Allocation Process re Core Strategy

In view of the fact that Leeds has admitted its Core Strategy housing target of 70,000 by 2028 is based upon flawed figures and that it proposes to review the figure, why can it not do so **before** the Site Allocation Plan is submitted for public examination to an Inspector? Why must it delay for three years? If the SAP were to be based upon the latest OMS 2011 Census figures then Leeds would not require to use any Green Belt in order to maintain a five year land supply.

It is interesting that Inspector Harold Stephens rejected the Plan for Durham on three major points, namely:

- An over ambitious housing target;
- A highly aspirational job growth target;
- The inclusion of too much Green Belt to accommodate the first two points.

This Durham decision sets an important precedent as the similarity with Leeds is unmistakable. Surely an Inspector must take account of the fact that the inclusion of so much Green Belt land in the Site Allocations Plan for this City is a direct result of a target based on flawed statistics. To consider this Plan before revising the target is surely “putting the cart before the horse” and inviting devastating environmental consequences for future generations. It is also making it impossible for designated bodies (ie Parish/Town Councils and designated forums) to prepare and complete Neighbourhood Plans as they will have no say whatsoever in deciding sites upon which to build houses to meet assessed housing needs for their areas as the sites will already have been predetermined. This mitigates directly against the true spirit of localism and makes a mockery of Neighbourhood Planning; it becomes a pointless exercise – paras 183, 184 and 185 on Neighbourhood Plans of the NPPF.

As and when an independent inspector is appointed to declare whether or not the Site Allocations Plan is sound (as required by para 182 of the NPPF), WARD would like the opportunity to outline in greater detail and to present, at the Examination in Public, yet further evidence to support WARD's assertion that the Plan has:

- Not been **positively prepared (there is no provision for impact or improvement to social or transport infrastructure)**
- Not **been justified** (the housing target is based on flawed statistics)
- Has not been shown **to be effective** (housing numbers delivered are already well behind where they should be in terms of meeting the 70,000 target – thus the target will not be met by 2028)
- Has not been shown **to be consistent with national policy (its use of Green Belt land is inconsistent with the whole of Section 9 of the NPPF Protecting Green Belt.) It therefore contravenes all of the five purposes of Green Belt outlined in para 80 of the NPPF.**

It should be noted also that Leeds has failed to carry out a full and comprehensive review of Green Belt as advised by Inspector Thickett in October 2013. The Site Allocations Plan must be considered unsound in light of all of the above.

Best wishes, Hayley Lynch
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