

From: [REDACTED]
To: [Site Allocations Plan](#)
Subject: PDE01644_Fw: Leeds Site Allocations plans objection
Date: 14 November 2015 12:25:07
Attachments: [Public Consultation response Phil.docx](#)

Phil Dawson

On Friday, 13 November 2015, 21:40, Phil Dawson [REDACTED] wrote:

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5th November 2015

RE: Public Consultation Response to the Leeds Site Allocations Plan

Dear Sir or Madam,

I wish to raise my objections to the current plans for housing in Aireborough.

Firstly I object to the procedure pursued by Leeds City Council for this 'Public Consultation' on the following grounds;

1. **Lack of publicity.** When a large extension to an existing house is planned the proposed developer has to advertise the fact locally, displaying the planning application notice and informing neighbours. But when a huge housing estate is proposed on a Green field there is nothing. Surely this cannot be legal? And even if it is, it is certainly not in the spirit of a genuine Public Consultation. Without the efforts of a dedicated band of local individuals, hardly anyone in Aireborough would even know about this process. Even the 'drop in' session held at Guiseley Methodist church was announced with less than 2 weeks' notice & even then only by a post on LCC's website. Thanks to activist led publicity over 1500 people attended which shows the strength of feeling but also made it virtually impossible to read the information presented or talk to the Council's representatives. This lack of publicity about the process also goes right back to the 'issues & options' consultation and the adoption of the 'Core Strategy' in 2013 which had only 8 responses from individuals in the area plus English Heritage, Natural England & Joseph Rowntree. To my mind this invalidates the outcomes from this so called 'consultation'.

2. **No attempt to educate the wider public on the planning process.** The planning process is fiendishly complicated and utterly incomprehensible to the lay-person. How can people effectively respond if they do not understand the 'planning-ese' language and the process? I believe there is a duty of care placed on the planning authority to help educate interested people on the process & offer 'plain English' explanations which LCC have patently failed at.

3. **Deliberately complicated & onerous online form.** The online response form put forward by LCC is also utterly incomprehensible, even to those of us who have taken an interest in the process and it feels as if it was designed to put people off objecting. Also, if someone wants to comment on more than 1 site, or

more than 1 part of the plan they are expected to fill in multiple forms, e.g. Section 2.2 states. 'Please specify the section of the Plan your comments relate to (choose only one)'. And there are 14 documents to choose from in section 2.2b alone – this could amount to dozens of forms per site!

4. **Abuse of process.** At the LCC planning meeting on 26th June 2015 which was set up to debate the Plan an 11th hour amendment to the agenda dropped in the proposed changes to land around the airport, which then dominated the discussion, leaving very little time for debate on the rest of the Plan. Furthermore, when Councillors came to vote on the Plan they had a binary option: to vote for or against the Plan. There was no option to vote for parts of the plan (e.g. brownfield sites only), effectively railroading councillors to vote for a Plan even if they held grave reservations about parts of it.

5. **Misleading advice.** LCC's own website states under the *question 'Can I comment on the Leeds Core Strategy housing numbers and other core strategy policies? No. The Housing numbers are set out in the Core Strategy which was adopted in November 2014.'* As previously, stated the lack of publicity on the adoption of the Core Strategy consultation to my mind invalidates this. The refusal to adjust the Housing numbers from LCC's desired number of 70,000 to the ONS's much lower number of 44,000 is something that should be commented on. Just because LCC don't want to discuss this does not mean it shouldn't be & to advise people not to is an abuse of LCC's position.

6. **Overall housing target.** The 70,000 target has not been supported by any substantial evidence & seems to be based on a desire by LCC in order to drive economic development and this is what LCC deem 'exceptional circumstances' to permit the destruction of Green Belt. Reducing the target to the ONS's figure of 44,000 would remove the need to build on almost all Green Belt. It appears to be only stubbornness that is stopping LCC accepting this.

7. **Allocation of housing target by area.** The allocation of 2,300 houses to Aireborough is also based on no sound evidence and is contrary to the Core Strategies own principles, the NPPF, the West Yorkshire Transport policy, the Leeds Strategic Economic Plan, the Kyoto protocol on climate change, EU Directive 1996/62/EC on Ambient Air Quality and Management, the EU habitats directive and common sense. The core strategy talks of development to regenerate brownfield sites and deprived areas, and the plan completely contradicts this by allocating so much of the target to areas that only have Green belt left to build on. This is a developer led plan.

8. **Lack of collaboration with Bradford City Council;** Aireborough borders Bradford on 3 sides but no meaningful collaboration has taken place and extensive recent developments just over the border have been ignored despite the additional strain on infrastructure that this places. A breach of NPPF 178 & 179.

9. **Ignoring the extensive recent development in Aireborough.** Over the last 10 years almost every brownfield site has been developed leaving Aireborough chronically short of land for employment use & with nothing but Green belt left to build on. 93% of allocated sites in the Plan are Green belt.

10. **Lack of a Comprehensive Green belt review:** the previous Planning Inspector stated LCC's plans were only sound *if* they undertook a comprehensive Green Belt review which they haven't done, choosing instead to do a selective review of the individual sites put forward by developers. This is also a breach of LCC's adopted Core Strategy; spatial policy 1 & 10. Nor does the plan contain any proposals to enhance the Green Belt.

11. **Not sustainable development.** The NPPF is framed around a presumption

in favour of Sustainable development. This plan falls so far short of that on so many levels by definition the presumption must therefore be that it cannot be approved. Multiple sections of the NPPF concern the effect of development on climate change & CO2 reduction which LCC seem to have decided to ignore; climate change is not just an inconvenient problem to be side-lined. This is a problem that threatens our planet & way of life and LCC should be ashamed of their arrogant disregard for this key component of the NPPF.

Secondly, I wish to object to the specific plans with regards to the Coach Road fields in Guiseley (HG5-2). Multiple factual errors were made in the initial Sustainability Appraisal of the site; had these not been made these sites would have been red listed & not currently being considered. I consider this to have not been positively prepared for the following reasons.

SA03 Accessibility to Education; the current plan is for a school plus 83 houses on this site. However, due to appalling access the building of a school is inconceivable without radical infrastructure improvements. If no school is built on site, this area is a primary school entrance 'black hole' as it sits approximately equidistant from all local primary schools meaning that new residents would be last in the list for a place under LCC's current entry criteria. As there is a school places crisis this would mean children being allocated places many miles away. Aireborough's 'peninsula' position means we are surrounded by 'Bradford' therefore this is likely to mean travel down the A65 to schools as far afield as Kirkstall. This makes the current plan ineffective; delivery of a school is extremely problematic and has knock on implications for the rest of Aireborough's sites.

SA08 Community; in conjunction with other local sites in Guiseley & Aireborough this would have a catastrophic effect on accessibility to local services & community services. For example, there are waiting lists at all age groups for junior football teams, swimming lessons at Aireborough Leisure Centre are oversubscribed, waiting lists of several years for allotments etc, etc.

Coach Road itself is part of the Sustrans link between Yeadon & Park Road and provides a link to the Spings & Jerrisons Woods and beyond. It has minimal traffic and long distance views over the woods. As such it is a focal point for dog walkers, horse riders, mountain bikers, runners as well as being heavily used by school children and other commuters. It is a calm, quiet road where people regularly stop to chat with friends, feed the horses and generally have a few moments each day where they feel in touch with nature, a valuable commodity for the mental wellbeing of the Community. This regular access to nature is widely acknowledged as having positive effects on mental health & wellbeing.

Related to this situation, HG2-6 has the potential to enhance local allotment provision & opportunities for Community engagement yet is being proposed for development. In 2007 LCC also recognised this and were challenging allotment owners who were allowing their sites to lay as unused wasteland to either start to use them as allotments or face a compulsory purchase order to have them turned over to the Community. The subsequent recession halted this plan yet the original issue remains. A site that could enhance the Community is currently largely wasteland & to add insult to injury is now proposed for development. In fact, in the whole of Aireborough there is no plan for the additional provision of any Community facilities. This is clearly in breach of NPPF sections 69, 70, 73, 74, & 75 on Promoting Healthy Communities.

SA11 Greenfield or Brownfield; the 2163a part of the site sits within the

Guiseley Conservation area; a detail not mentioned in the initial appraisal. The whole of 1180a and part of 1311a are within 100m of the Conservation area. All 3 were designated by LCC in the previous UDP as 'Special Landscape area' and all 3 parts are Green Belt. No justification has been given for why this is no longer relevant, and LCC have refused to undertake a Comprehensive Green Belt review as required by the previous Planning Inspector, thus invalidating their own Core Strategy and rendering all Green Belt development in the plan unsound.

Section 9 of the NPPF focuses on conserving Green belt. HG2-5 clearly fulfils the 5 Green belt purposes set out in NPPF 80 and there is no justification for removing these fields from the green belt. This plan is a breach of NPPF 79, 80, 81, 83, 84, 87, 88 & 89.

Section 10 highlights the need to plan for a low carbon future; further development of Aireborough which is distant from jobs and the transport infrastructure will dramatically increase CO2 emissions in excess of more appropriate sites.

Section 11 highlights the duty to 'enhance the natural and local environment by: protecting and enhancing valued landscapes' another clear breach along with further breaches of 110, 111 & 114

SA12 Biodiversity; No assessment of biodiversity has taken place & was purely based on reported sightings. The fields are fringed by mature native trees & ancient dry stone walls and are used as pasture land for sheep & horses. In the summer they are left to grow for winter fodder. This relatively low intensity use makes them an ideal home for a wide variety of birds (barn owls, little owls, woodpeckers as well as migratory birds such as plovers, lapwings, curlews). The Eurasian Curlew, Northern Lapwing & Red Kite are regular, migratory visitors & all 3 have recently been cited as 'near-threatened UK bird species' by the International Union of Conservation of Nature (IUCN) and as such it is vital that these sites are preserved to help with their Conservation. The fields are also home to a wide variety of animals both large & small including a female deer that has used it annually as a nursery as well as pipistrelle bats. A beck on the Western edge hasn't been studied but is likely to host a wide variety of life.

Section 11 of the NPPF talks of 'Conserving and enhancing the natural environment'. This plan breaches sections 109, 110, 111, 114, 117, 118.

SA14 Flood Risk; again no assessment has been made. There is a beck plus there is believed to be a natural spring. Site 1311 & 1180 are separated by Springs Road (aka old Coach Road) which turns into a stream after rain. 1311 also has a spring close to the footpath and is extremely 'boggy' in winter.

SA15 Transport Network / Access; incredulously this was judged a '1' by LCC. Almost all access to this 418 house estate is along Silverdale Avenue with minimal vehicular use of the unadopted & potholed Coach Road. An additional 115 houses (including the allotments (HG2-6) and a school would lead to gridlock on a daily basis. LCC have blithely suggested that Coach Road 'should be offered for adoption'. This completely ignores the fact that in 2007 LCC offered to adopt Coach Road and this was unanimously rejected by the frontagers. No discussion has been had with the frontagers since 2007 and in canvassing local opinion I can assure LCC that nothing has changed.

A new 'infill' house is currently under construction next door to number 11 Coach Rd, approximately half way along the unmade section (from Silverdale Mount to Park Road). This was opposed by LCC Highways due to narrowness of the road & the effect on access for emergency vehicles. Presumably if 1 house is opposed by highways they would also oppose 115 houses & a school and if the frontagers don't offer up Coach Rd for adoption and literally pave the way for this unwanted

development I am at a loss to see how this is a viable site. No Transport assessment or Transport Statement has been made for this site, despite the significant amount of movement that would be generated by the proposed school; a breach of section 32 of the NPPF.

On the wider scale the A65 is the primary artery for Aireborough & congestion is already a major issue. At peak times travel into Leeds / access to the motorways takes in excess of an hour. Trains arrive at Guiseley already full from 'downstream' commuters. The A65 & Park Road are in the top 70 most congested roads in Leeds. The airport is planning for a doubling of passengers. Even if the proposed airport link road goes ahead this will merely take some of this extra traffic and the revamped Horsforth roundabout has had no noticeable effect on journey times. Nor is this just a weekday – peak time issue; locals know that it only takes M&S to have a good meal deal offer on & the A65 & Park Rd grind to a halt, regularly backing up the full length to Bradford Road! Aireborough is already choked from excessive development in recent years, to further compound this with no infrastructure improvements is madness.

The scale of congestion was repeatedly referred to by LCC officials recently with the announcement of the separate consultation with regards to a new link road to the airport which is planning for a doubling of passenger numbers to 6 million per annum. Whichever of the 3 schemes ultimately goes ahead this will have no effect on traffic in Aireborough but will make the City centre to Horsforth stretch of the A65 even more congested than it is currently, further increasing journey times to access jobs and other City Centre resources.

This site along with all the other sites in Aireborough are a clear breach of the West Yorks Transport strategy as well as sections 30, 32, 34, 35, 36, 37 & 38 of the NPPF's section on Promoting Sustainable Transport.

SA18b Air Quality; the local impact of the proposed plans on local roads would lead to a huge increase in NO2 levels and LCC are already in breach of EU guidelines on NO2 levels. This can only be mitigated by a huge increase in the use of public transport use & with no infrastructure plans for Aireborough's already overcrowded network there is no plan for how this could happen. The Leeds Low Emission Zone Technical Feasibility Study of November 2014, highlighted the poor state of Air Quality in Leeds, especially with regards to particulates & nitrogen dioxide. Outside of the Outer ring road, the A65 corridor was picked out as being particularly affected and already & in breach of the 40mg target. Further development in Aireborough can only exacerbate this.

SA20 Distinctiveness; 2163 is part of the Guiseley Conservation area & an integral part of the 'setting' that gives it its character. All 3 sites were designated Special Landscape Areas as well as being Green Belt, giving them 3 supposed levels of protection from development. Natural England have recently come out against the plans for HG2-5 (& many others) calling them unsound.

In summary, had these sites been properly and fairly appraised in the first place they would have had a highly negative appraisal, by my assessments each site would have had a score of -14 or -15 rather than LCC's assessments of -4 / -5. To address the issue of 'soundness' I believe the plans for Coach Road have not been positively prepared, due to the multiple errors made in the sustainability appraisals. Neither are they justified as evidence gathering has been minimal and a desire to build 70,000 houses (26,000 more than the ONS say) does not constitute 'exceptional circumstances' to justify taking land out of the Green Belt. As detailed above the plan is not effective as the access issues in particular make it undeliverable. Finally the plan is inconsistent with at least 31 sections of the

NPPF – specifically, sections 30, 32,34 – 8, 69, 70, 73-6, 79 – 81, 83, 86-89, 93, 95, 109, 110, 111, 114, 117, 118, 178 &179. 31 breaches out of 219 smacks of either arrogance or incompetence. The vast majority of these breaches are in common with most of the Aireborough sites owing to the ‘plans’ focus on building on Green Belt land on the fringes of the City – away from access to transport links, motorways and jobs which are predominantly near the City Centre. The recent development of almost all of Aireborough’s brownfield sites has naturally had the consequence of turning Aireborough into a dormitory for Leeds, exacerbating the transport problems.

This is not a sound plan!

Next I would like to object to the plan for the Coach Road / Silverdale Avenue allotments, site HG2-6.

This site of privately owned allotments has been left largely unused for many years by absentee land owners despite the chronic shortage of allotments in the area. Attempts to rent or buy the unused plots for use as allotments have been spurned. This was intended to prove that they weren’t required & should therefore be developed. As previously mentioned, in 2007 LCC attempted to address this & threatened the owners with Compulsory Purchase Orders if the sites remained unused as they were effectively in breach of planning rules. The subsequent financial crash derailed this plan & now LCC have fallen in line with the landowners & developers. Lack of finance to support this plan does not mean it was the wrong plan.

The plans for this site are not effective or positively prepared for the following reasons;

- Currently 3 of the owners are refusing to sell to a developer as they want them to remain as allotments.
- Access from Coach Road side is affected by the same issues detailed above with regards to the adoption issues for Coach Rd and any access would have to be via Silverdale Avenue which is already problematic. The majority of the 400 houses on this estate already use Silverdale Avenue for access & the initial stretch of this road at the junction with Park Road is flanked by terrace housing, with on street parking which already causes significant difficulties causing traffic to weave between parked cars. Further development of this estate without a significant improvement in access is untenable.
- If HG2-5 is also developed, especially if a school does go ahead, the cumulative impact is unthinkable.
- LCC’s original 2007 plan for this site was actually the effective one. Any land owner that is not actively using the allotments as they are intended should face a CPO for them to be turned over to a community group to manage as community allotments. Section 70 of the NPPF talks of delivering social, recreational & cultural facilities. At no point in the plans for Aireborough is the provision of allotments addressed yet this is an obvious opportunity to redress the deficit of allotments in the area. Section 74 states that ‘existing open space, sports & recreational building & land should not be built on unless: an assessment has been undertaken which has clearly shown the open space or buildings or land to be surplus to requirements’. No assessment has been made & if it was it would show that these privately held allotments are required by the community, not as wasteland or as more housing.
- I strongly support the application to have the allotments designated as

Community Green Space, managed by a volunteer Community Group.

Finally I wish to reiterate my objection to the overdevelopment of Aireborough in general; specifically to sites HG2-1, 2, 3, 4, 10 & 12. These are all Green Belt land – 93% of the current plans. Aireborough has bucked the trend over recent years with development continuing at many sites throughout the recession. The community has accepted this recent development as we recognise the need for more housing & support use of brownfield sites but enough is enough. We have no brownfield sites left to offer.

Neither has account been made of the extensive developments over the border in Bradford all of which filters into the A65 around Guiseley & Yeadon.

There is more than enough brownfield land in Leeds. Land that is close to major infrastructure, motorways, jobs. Land that could be regenerated in a positive way. Land which would be able to produce low carbon, genuinely sustainable housing at an affordable place. Land that is currently wasteland or of low utility that could be turned into a genuinely desirable place to live. Land that could and should be used for true development. LCC should be told to go back to the drawing board and come back with a genuine plan for the City which achieves the objectives set out in the Core Strategy and the NPPF not a list of fields that developers want to build on which is all this version is.

LCC's refusal to back down and accept the smaller ONS target of 44,000 coupled with the refusal to revise these plans in light of the Government's recent announcements to increase the supply of brownfields sites smacks of an arrogant approach to the people of Leeds that they are supposed to serve. The destruction of Aireborough's Green Belt is not necessary; the only people who want this are the developers & land owners.

LCC seem to be in the thrall of the developers and desperate to build at all costs, I hope that I have highlighted some of the reasons why this should not be permitted and that our green fields can be preserved for future generations to enjoy as was originally intended.

I would like to be kept informed of the next stages of this process & to attend the planning hearings.

Yours sincerely,

Phil Dawson