

From:
To: [Site Allocations Plan](#)
Subject: PDE01699_Fw: Site Allocations Plan for Leeds
Date: 13 November 2015 20:33:28

I forgot to say I would likely you to keep me informed of the public examinations, submission of the plans and potential outcome of the review as I would like to retain my right to attend and speak.

KR
Pippa Dawson

On Friday, 13 November 2015, 20:27, Pippa Dawson

wrote:

Dear Sir/Madam

General Points

Firstly I would like to say that the consultation period has been a farce. In order to 'consult' people have to know about it. Public Awareness by LCC has been minimal they have had precisely 14 static adverts around Leeds up for less the 14 days each. (information from David Feeney himself). I have been aware of no other advertising. If it was not for the various forums, town councils, action groups, MP's and councillors who have wanted the public to take notice and respond, the public would have known nothing about it, doubtless what the council hoped.

Thanks to this publicity over 1500 people attended a local meeting which shows the strength of feeling. 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.

The numbers... the overall housing target. The 70,000 target has not been supported by any substantial evidence and is based on a desire by LCC in order to drive economic development and form a Northern Powerhouse. They attempted to use this figure to gain funding (which actually failed) and this what we are left with. Reducing the target to the ONS's figure of 44,000 would remove the need to build on almost all Green Belt. This must be taken into consideration.

Collaboration with other areas, in this case there has been a total lack of collaboration with Bradford City Council, a breach of NPPF 178 & 179. 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 they place.

The previous Planning Inspector stated LCC's plans were only sound if they undertook a comprehensive Green Belt review which they haven't done, doing only 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.

Historic England (formerly English Heritage) had the following to say on the Leeds Plan in general- they considered the whole plan to be UNSOUND (from letter to LDF Publication Draft Consultation 21 Oct 2015)

These general comments are related to the following sites in Aireborough:

HG2-1

HG2-2

HG2-5

HG2-9

HG2-10

HG2-12

‘Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. This means that the plan, as a whole (including the sites it is putting forward as allocations), has to set out a framework which is likely to conserve the historic environment of the Plan area. The Sites Allocations Local Plan proposes a large number of sites for development which could harm elements which contribute to the significance of the City’s heritage assets.

There are, for example:-

- 11 sites which involve the loss of open spaces adjacent to Conservation Areas,*
- 6 which involve the loss of open spaces within Conservation Area,*
- 8 sites which involve the development of open spaces in the vicinity of Listed Buildings,*
- 6 more where the development of an open space could impact upon both a Conservation Areas and Listed Building,*
- One which seems likely to directly impact upon a Scheduled Monument, and*
- A large Urban Extension in the vicinity of a Grade I Historic Park and Garden*

The Allocation of a site for development in the Local Plan is, as Paragraph 2.52 of Section 2 of the Plan makes clear, “establishing that the site is suitable for that use” and, therefore, that the principle of development in those particular locations is acceptable. However, in the case- 2 -of this Local Plan, there has been absolutely no evaluation of what impact the loss of these currently-open areas and their subsequent development might have upon those heritage assets.

In the absence of any assessment of the degree of harm which the proposed Allocations might cause to the historic environment or, indeed, what measures the Plan might need to put in place in order to ensure that any harm is minimised, the plan cannot demonstrate that the development of the sites it is putting forward for development is compliant with the Plan’s policies for the protection of the historic environment as set out in Core Strategy Policy P11. Moreover, the Plan also fails to demonstrate that:-

- (a) The sites it is putting forward for development will deliver a “positive strategy for the historic environment” as is required by NPPF Paragraph 126.*
- (b) The sites that are allocated will be likely to “contribute to protecting or enhancing the historic environment”. Therefore, it has not shown that it is likely to*

deliver sustainable development in terms of the historic environment [NPPF Paragraph 7].

(c) The sites which it has allocated are likely to “conserve heritage assets in a manner appropriate to their significance”. Therefore it has not shown that it will be likely to deliver the Government’s objectives for the historic environment [NPPF Paragraph 17].

(d) It has complied with the statutory duty under S72 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay “special attention” to “the desirability of preserving or enhancing the character or appearance” of its Conservation Areas.

Moreover, there is no evidence that, in preparing the plan, the local planning authority has had “special regard to the desirability of preserving” any of its Listed Buildings. Whilst it is accepted that S66 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 does not apply specifically to Plan making, the absence of any evaluation must bring into question the deliverability of a number of those particular sites. When the requirements to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses may mean that the quantum of development on that particular site is, either, unachievable or, at worst, that the need to safeguard the setting of the building actually renders the site undevelopable. For the above reasons, therefore, Historic England considers that this plan is unsound.’

Site specific Objections:

Site HG2-5

I wish to object to the specific plans with regards to the Coach Road fields in Guiseley (HG5-2). 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 be for consideration.

I consider this plan to have not been positively prepared for the following reasons.

SA08 Community;

In conjunction with other local sites in Guiseley & Aireborough there will be a combined disastrous effect on accessibility to local services & community services.

Coach Road itself is part of the Sustrans link between Yeadon & Park Road and provides a link to the Spings & Jerrisons Woods and beyond. This has been developed in conjunction with Leeds City Council and they promote this. The reason for this is it has minimal traffic as such it is much used by dog walkers, horse riders, mountain bikers, runners as well as being heavily used by school children and other commuters.

Green Exercise is to be encouraged it has been shown to be vital for the health and wellbeing of communities. 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 unsound.

As mentioned above Historic England had the following to say about site HG2-5 in a letter to LCC in October 2015. They also considered the plans for this site to be UNSOUND.

‘The northern half of this site lies within the Guiseley Conservation Area and the remainder adjoins its boundary. When the Conservation Area was originally designated, there must have been an acceptance that the open area at the northern end of this Allocation contributed towards the character or appearance of the area. Therefore, one might conclude that the loss of this space would be likely to harm an element which contributes towards the significance of the Conservation Area.

By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the character of the Conservation Area or what harm might result to those elements which contribute to the significance of this designated area by its eventual development .

Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition, the Council has a statutory duty under the provisions of S72 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay “special attention” to “the desirability of preserving or enhancing the character or appearance” of its Conservation Areas. In the absence of any assessment of the degree of harm which this proposed Allocation might cause to the Conservation Area, or, indeed, what measures the Plan might need to put in place in order to ensure that this harm is minimised, the Plan cannot demonstrate that the allocation of this area is compliant with, either, the statutory duty placed upon the Council under the provisions of the 1990 Act, or the requirements of the NPPF.

Before allocating this area, therefore, there needs to be an assessment of the contribution which this currently-undeveloped area makes to the character or appearance of the Conservation Area, and what effect the loss of this site and its subsequent development might have upon the elements which contributes to its significance.’

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 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

All 3 sites are bordered by ancient dry stone walls and mature native trees. These

provide a fantastic habitat for a wide range of rare and threatened species, including bats, owls (small, barn & tawny), red kite, sparrow hawk, goshawk, lapwings, curlews, oystercatchers, woodpeckers, jays, nuthatch, bullfinch, wrens, harvest mice, deer, hedgehogs and foxes. 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. The sites also act as a key component of a green link corridor, for a wide range of animals and birds, linking the Engine Fields Nature Park in Yeadon with the wider countryside. 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. Site 1311 & 1180 are separated by Springs Road which turns into a stream after rain!

SA15 Transport Network / Access Most of the access to this 400+ house estate is along Silverdale Avenue with a small use of the unadopted Coach Road. The start of this road is bordered by terraced houses with on street parking which already causes significant difficulties and weaving between parked cars. An additional 115 houses (including the allotments (HG2-6) and a school would lead to gridlock on a daily basis. The frontagers of the unadopted road did not agree to adoption 10 years ago and there is no reason to believe this will have changed now.

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.

Locally the A65 is the primary route 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 are packed by the time they reach Guiseley – the last stop before . Aireborough is already gridlocked from development in recent years, to add to this with no infrastructure improvements is ridiculous.

Just recently the need for an airport link road was announced- due to the problems on the A65. This therefore makes me even more incredulous they intend to add to this.

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; Increase in traffic would lead to a huge increase in NO2 levels and LCC are already in breach of EU guidelines on NO2 levels. Where the public transport are plans to mitigate 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.

Soundness

The plans for Coach Road have not been positively prepared, there are multiple errors made in the sustainability appraisals. The desire to build an astronomically enhanced 70,000 houses does not constitute the 'exceptional circumstances' to justify taking land out of the Green Belt.

The plan is not effective as the access issues in particular make it undeliverable. Finally the plan is inconsistent with 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 The vast majority of these breaches are in common with most of the Aireborough sites. This is not a sound plan!

Site HG2-6 Silverdale/Coach Road Allotments:

This site of privately owned allotments has been left largely unused for many years by absentee land owners, this has been allowed by LCC despite the chronic shortage of allotments in the area.

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

Three 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 as site HG205, all access would be via Silverdale Avenue.. Further development of this estate without a significant improvement in access is untenable. Again against SA15 Transport Network/Access

The land owners not actively using the allotments should face a CPO for them to be turned over to a community group to manage as community allotments. An application has been put forward to have the allotments designated as Community Green Space, managed by a volunteer Community Group I would fully support this plan. This situation for HG2-6 has the potential to enhance local allotment provision & opportunities for Community engagement exercise and wellbeing. For 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.

Green Belt land accounts for 93% of the current plans in Aireborough. We have no brownfield sites left.

Areas in more central Leeds have brownfield land crying out for development. This is close to major infrastructure, motorways and jobs. It may not be the best for the developers, but it is apparently 'Our City- Our say' so why should LCC be bothered about the developers.

No Soundness for any of the following sites:

- HG2-1**
- HG2-2**
- HG2-3**
- HG2-4**
- HG2-5**
- HG2-6**
- HG2-8**
- HG2-9**
- HG2-10**
- HG2-12**
- HG2-41**

Please preserve these greenbelt and greenfield areas for future generations.

Sincerely

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