

**From:** [REDACTED]  
**To:** [Site Allocations Plan](#)  
**Subject:** PDE01878\_Response to LDF Publication Draft Consultation - Leeds Site Allocation Plan  
**Date:** 13 November 2015 09:39:38  
**Attachments:** [Sue Lister.docx](#)

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8 November 2015

LDF Publication Draft Consultation  
Forward Planning and Implementation  
The Leonardo Building  
2 Rossington Street  
Leeds  
LS2 8HD

Response to LDF Publication Draft Consultation – Leeds Site Allocation Plan  
Sections **HG-3-1 (4043) Ings Lane, Guiseley**  
**HG-2-1 (3026) New Birks Farm, Ings Lane, Guiseley**

Dear Sir/Madam

I strongly disagree with the above sites being used for housing and I do not consider the Leeds Site Allocation Plan to be sound.

**The plan is not justified**, as:

1. LCC have only reviewed Green Belt Sites which were selected for development and not the comprehensive Green Belt review which was requested by the inspector of the Core Strategy.
2. LCC have failed to involve communities in the drawing up of plans.
3. The review of the impact of development of these sites has failed to consider the impacts on existing infrastructure and ecology, specifically: Ings Lane is congested already with widespread on-street parking along its length – additional pressure on this increasingly-used thoroughfare is not sustainable and there are no viable alternative access points; the outstanding variety of wildlife and rare nature of the rural wetland of site 4043 is irreplaceable.

**The plan is not positively prepared**, due to:

1. The infrastructure and local facilities are not sufficiently able to cope with increased pressure development would bring; this follows a period of rapid expansion of housing in

the area, during which promised amenities at recently developed sites have not been put in place despite developer assurances as part of planning/consent for building further housing (for example, amenities at the High Royds development). The A65 is already incredibly congested (Councillor Richard Lewis confirmed this on *Look North*).

2. The housing stock that is required to service the apparent housing shortage is not typical of houses that developers wish to build, nor have a track record of building, in the area – specifically, building 4-plus bedroom executive/luxury houses does not address the affordable housing shortage which surely should be the focus of the overall Leeds Site Allocation Plan, as reflected in the ANDF emerging housing survey.
3. The green spaces targeted for development by the plan, cannot be replaced – the short-term approach reflected by proposing to build on these green spaces is further evidence of the lack of preparation of the plan for the local area.
4. Leeds Housing target of 70,000 has been described as aspirational. Revised Office of National Statistics figures suggest a much lower figure of 44,500 however LCC will not change their target – a lower figure would reduce the need to build on green spaces.

**The plan is not effective, evidenced by:**

1. The proposed 418 houses for sites HG2-1 and HG3-1, represents a development slightly smaller than that on the High Royds site, where houses remain unsold many years after the development started .
2. These sites currently form a green belt buffer between neighbouring towns of Guiseley and Menston, preventing the merger of the two (an official purpose of “greenbelt”)
3. Further, (also official purposes of “greenbelt”), these sites both epitomise the special character & setting of the local area and it’s significant diversity of wildlife, the protection of which is a must for safeguarding these green spaces whilst looking to develop more appropriate derelict sites/those that could be regenerated, including those with existing infrastructure fit to cope with further development. **Site 4043** in particular is a natural wetland (unique in this area) and should be classified as heritage landscape – being the natural habitat of a number of endangered species. Mire Beck regularly overflows in to the fields and a spring rises in the middle of the Ings, which feeds the wetland together with considerable water run-off from the Chevin. A great asset to the area would be to regenerate the footpaths that surround the Ings so they form part of a nature trail through the North West Leeds Country Park connecting it to other areas. The biodiversity of the site (Lapwings, Herons, Curlew, Oystercatchers etc) lends itself to being an excellent site to place viewing hides – a great community asset for wellbeing, education for local schools and to help the local economy by attracting visitors.
4. The sites specifically mentioned in this letter are also sites of valuable agricultural land.

**I also believe that the plans are not legally compliant:**

1. There has been a lack of transparency throughout this process, including no clear communication of the process, the associated deadlines, nor the implications of the activity being carried out. I do not feel I have been consulted fully in the site allocation process.
2. The collaboration between related bodies carrying out the plan is not evident – a duty to cooperate exists to ensure the correct plan can be carried out for the local areas affected;

it is my belief that this has not been pursued to the extent that it should have been to fulfil this duty of cooperation (specifically, a single meeting between Bradford and Leeds councils does not constitute evidence of sufficient “cooperation” in a matter of this significance).

**How LCC can make the plan sound:**

It is clear that the housing target of 70,000 homes is significantly higher than other figures produced (ONS) showing the development required in the area – this should be fully considered prior to taking short-term actions to irreversibly remove valuable green spaces from our local communities. Once these are gone, they are lost forever. In conjunction with ensuring compliance with the National Planning Policy Framework, this would be a good start to ensuring a new plan could be prepared that is fit for purpose.

Also, ensuring that the right housing can be supplied to meet the required demand is critical to ensuring success of the plan; something I do not believe is met by building further executive houses on green spaces. Doing an appropriate review, and ensuring houses are truly affordable to those to whom this plan should benefit, would also allow factors such as transport infrastructure and proximity to amenities to support such a positive plan – these are not evident today and are vital to the success of any plan we as a community should pursue.

In closing, I believe there is a significant gap in appropriateness of the plan to the extent that it does not constitute a meaningful and executable plan meeting the needs of the local area, falling short in a number of critical areas which would destine failure for all; this matter is not one to take lightly, given decisions to develop green spaces are not ones that can be reversed for us or future generations. In light of these facts, appropriate amendments should be made to the plans currently being proposed to ensure that only in the absence of any other option, should we consider the development of our green spaces in this locale, for which we have an obligation as custodians.

I would like acknowledgement of my response and request to be informed of the submission of the plan for public examination and/or the adoption.

Yours faithfully

Sue Lister