

From:
To: [Site Allocations Plan](#)
Cc:
Subject: PDE01936_Leeds Site Allocations Plan HG2-5 Coach Road Fields, Guiseley (sites 2163A / 1180A /1311A)
Date: 12 November 2015 20:08:45

I wish to object to the proposed development of greenbelt at:

HG2-5 Coach Road Fields, Guiseley (sites 2163A / 1180A /1311A)

I believe that the proposed development is Not Sound, will be severely detrimental to this area of Guiseley, and should be removed from the plans.

Positively Prepared

The allocation ignores the fact that it is a Conservation Area and Special Landscape Area.

Recent over intensive development in Aireborough has placed excessive strains on local services, infrastructure and roads.

Allocations have been made without any assessment of local housing needs.

There has been no traffic survey of the sites, no ecology survey, and an inadequate flood risk assessment of land which is known to contain springs.

These sites are situated on the Leeds/Bradford boundary, but there have been no consultations with Bradford.

There have been no consultations with the local community prior to issuing the plan.

Effective

There is no evidence that any of the necessary partners (rail, highways, environment, water) have approved, or even seen, this plan. There has been no traffic survey of the sites. The suggestion is to put a school on Coach Road, but there is no evidence that there has been any forward planning for one.

Justified

The current housing target which drives the need to develop on the greenbelt is flawed. It is based on outdated housing targets which require that over 66,000 new properties are still needed. This urgently needs to be brought in line to the latest 2014 figures (from the Office of National Statistics), which show a need of only 46,000 new homes.

Justification for development of Coach Road fields comes in the form of an LCC Sustainability Assessment, which has consistently under-scored on sustainability and green belt purpose. Key factors such as Conservation status, Special Landscape Area, Tree Preservation Orders and footpaths were not factored into the initial assessments.

A plan to re-assess the housing target needs to be put in place before the site allocation plans are progressed, and not after them, as currently planned.

Consistency with National Planning Policy

NPPF states that the target level of housing development within the plans should be capped in line with the capacity of brown field sites to accommodate it, to protect and enhance greenbelt. The current plans significantly exceed this which will result in the permanent and unnecessary destruction of greenbelt.

NPPF states that greenbelt is to be protected and requires 'exceptional' circumstances to be built on. There is nothing exceptional about these plans, which are simply part of the Leeds scheduled house building policy plan.

NPPF states that brown field sites are to be prioritised over the development of green field and greenbelt, but these plans put 90% of proposed housing in Aireborough on greenbelt land. All of Coach Road fields are greenbelt.

NPPF states that infrastructure must come first. There is no plan in place which addresses the problems of Aireborough's roads, health provision, or education.

I disagree with the proposed development with reference to the following themes:

Loss of Greenbelt

Coach Road sites prevent the unrestricted sprawl of a large built-up area, which the Silverdale area would become if further developed. They act as a buffer in preventing encroachment of the countryside, and they preserve the character of the south west corner of Guiseley. These sites have been put forward because the Aireborough area brownfield sites have almost all been developed. Brownfield sites across Leeds should be looked at before building on Greenbelt. It is a sad reflection that more than 90% of the allocated sites in Aireborough are on Greenbelt.

Conservation/Heritage

All Coach Road sites are Green Belt and Special Landscape Area. Site 2163A is within the Guiseley Conservation Area. Site 1180A is within the 100m buffer zone for the

Conservation Area, and site 1311A is partially within the buffer zone.

Highways and Transport

There has been no traffic survey of the sites. There has been no assessment of the impact on air quality caused by the increase in traffic. Traffic in Park Road is chronically congested and frequently stationary for long periods during the day, and all traffic leaving these sites would have to exit on to Park Road. The main route in and out of the estate is via Silverdale Avenue, a narrow road with cars often parked on both sides, which is already overloaded. The wider road network around, and including the A65, is always heavily congested since the arrival of major retailers at the Guiseley Retail Park and Westside Retail Park. The proposed supermarkets at Yeadon and White Cross Guiseley will further compound this situation.

There has been no assessment of the impact of more development on rail services. Investment in the railway network has been substantial, but has been rapidly absorbed by the increasing population of the area. It is no longer possible to get a seat on the train into Leeds from Guiseley at rush hour, even though we have longer and more frequent trains. We are now back to the situation we had in 1995.

Ecology/Landscape

The Coach Road fields are situated on the south western edge of Guiseley along the border with Bradford. As prime grassland they are used for the grazing of horses and sheep and they are usually left to grow long in the Summer to be harvested for hay. All three sites are bordered by dry stone walls and mature native trees. These provide a habitat for a wide range of species. The sites also act as a key component of a green link corridor between the Engine fields Nature Park in Yeadon and the wider countryside, for a wide range of animals and birds.

I do not consider the plan to be legally compliant because:

There has been no community involvement

There has been no collaboration with neighbouring councils

There has been only limited adherence to many sections of the NPPF

In order to make this plan Sound, Leeds City Council should:

Abide by the National Planning Policy Framework

Carry out a Comprehensive Greenbelt Review

Reduce the housing target to 46000 (ONS data)

Carry out a review of housing needs

Have an infrastructure plan before a site allocations plan

Preserve Conservation Areas

Respect Special Landscape Area designation

Engage with local communities

Cooperate with neighbouring councils

I would like to be notified of the Submission of the Plan for Public Examination and of the Adoption of the Plan

Yours faithfully

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