

From:
To: [Site Allocations Plan](#)
Subject: PDE02196_HG2 - 1 (3026) New Birks Farm, Ings Lane, Guiseley
Date: 09 November 2015 13:05:42

Hello

My name is Hayley Mason and I live at 46 Ashtofts Mount, Guiseley, Leeds, LS20 9DB and my comments are relating to The Leeds Site Allocation Plan. The section of the plan I will be commenting on is HG2 -1 (3026) New Birks Farm, Ings Lane, Guiseley. I do not agree with the proposed use of this site for housing as I do not consider the Leeds Site Allocation Plan to be sound. This is because it does not meet three areas of soundness:

- 1) The plan is not justified.
- 2) The plan is not positively prepared.
- 3) The plan is not effective.

1) The Plan is not justified:

- Leeds have not done a comprehensive Green Belt review as was asked by the inspector of the Core Strategy. They have only reviewed Green Belt Sites which were selected for development.
- They have not involved communities in the drawing up of their plans.
- For each site Leeds have done a sustainability appraisal where they have researched how each will impact on the community and how the new residents will access amenities. These sustainability appraisals did not include any transport reviews or ecology reports which are the two main points which many people are concerned about, they also contain mistakes due to lack of research.

2) The Plan is not positively prepared:

- There are not enough facilities to cope with the number of houses proposed in Aireborough.
- The A65 is congested.
- No real assessment has been done on the access to each site or the extra traffic it will create.
- Doctors and dentists can only just cope.
- For each site Leeds have assessed what infrastructure is present now, i.e. how far is the site away from a school, bus stop, train station, doctor's surgery and made no recommendations as to what needs to be put in place to accommodate the new households.
- Leeds have not done a housing needs survey, so it is possible that developers will plan to build larger houses - this is for obvious reasons. The ANDF emerging housing survey suggests the area needs affordable houses for first time buyers and those suitable for couples downsizing.
- Leeds housing target of 70,000 has been described as aspirational. Revised figures suggest a much lower figure but LCC will not change their target. A lower figure would reduce the amount of Green Belt required to meet the plan.

3) The Plan is not effective:

- It would appear that Leeds and Bradford are not collaborating when planning where housing is planned in terms of roads and traffic congestion. Developments in Menston, Burley and Apperley Bridge will all impact on the A65 but not enough consideration has given to this.

Furthermore The Ings Site specifically meets five Green Belt purposes, these are:

1. To check the unrestricted sprawl of large built-up areas.

2. To prevent neighbouring towns from merging into one another.
3. To assist in safeguarding the countryside from encroachment.
4. To preserve the setting and special character of historic towns.
5. To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

There are several facts which have been ignored in the site specific survey:

1. The site is in active economic use, is Grade 3 agricultural land and there is a well trodden footpath through the area. A development here would mean the loss of valuable agricultural land.
2. Mire Beck is susceptible to overflowing into the fields on a regular basis.
3. The site is identified in the Leeds Habitat Network and is home to diverse fauna.
4. 19 trees have tree preservation orders and there are mature hedgerows. The trees are defined in the TPOs as adding to landscape value and a feature of intrinsic beauty.
5. The Ings defines Guiseley as a settlement separate from Menston, Mire Beck forming the boundary. Development would merge the two, contrary to Green Belt purpose.
6. The fields form a Green Belt buffer between Guiseley and Menston.
7. It was a Special Landscape Area in the 2006 UDP but seems to have lost its status.
8. The local infrastructure is not sufficient to cater for a major new residential development, particularly given the current A65 congestion issues. There are also traffic issues on Ings Lane at present, particularly where residents have to park on the roadside. Furthermore, doctors, dentists and school places are at capacity.
9. Aireborough has already taken its fair share of development since 2000, resulting in almost all of its Brownfield sites being developed as factories have closed, leaving little local employment.
10. There have been instances of sewage pollution in Mire Beck due to the poor state of the sewers in the area. Yorkshire Water have still not solved the problem and have admitted that the present state of the sewer network is struggling to cope.

Crucially, the plan is not legally compliant:

1. Leeds City Council have not fulfilled their duty of Community involvement.

- LCC's document of community involvement was written in 2007. It is out of date and does not include their duty to collaborate with forums and parish/town councils designated to draw up neighbourhood plans. As a member of the Guiseley community I have not been consulted fully in the whole site allocation process.
- I was not told of the eight week consultation period, or the fact that LCC were holding a drop in meeting in Guiseley by LCC. I did not receive leaflets by ANDF and MAGPG.
- No genuine attempt has been made to engage with the community or to help them understand what is being proposed or how to respond to the consultation.
- There was one advert in Aireborough on a phone box in Guiseley which was taken down three weeks into the consultation.
- No where do any documents state that 90% of Aireborough's sites are on Green Belt.
- Documents refer to Green Belt as Greenfield which is misleading and suggests that land has already lost its Green Belt status.
- A fully comprehensive Green Belt review has not been carried out as specified

by the inspector at the Core Strategy hearing.

2. Leeds City Council have not fulfilled their Duty to Co-operate.

1. In their background paper of September 2015, one meeting is recorded with City of Bradford Council on 6th March.
2. How can one meeting have discussed all of the points on which they should co-operate? Minutes for this meeting have not been forthcoming, even though they have been requested.
3. In the Leeds Local Plan, a comprehensive review of Green Belt should have taken place alongside Bradford. Many of our sites have boundaries with Bradford. Aireborough is a fringe area. There is no evidence that this has taken place.

Solutions on how to make the Leeds Plan sound.

1. The Leeds housing target should be reduced from 70,000 to 44,000 - in line with ONS data.
2. The plan must abide by the National Planning Policy Framework.
3. The plan must be drawn up again, with a better methodology, for example using Brownfield sites first.
4. Build closer to areas with better infrastructure.
5. Build closer to where the majority of jobs are, e.g. Central Leeds.
6. Carry out a comprehensive Green Belt review.
7. Communities must be genuinely engaged with.
8. Full co-operation with Bradford Council.

I would like to be present at the inspector's hearing and please send acknowledgement of my response. I would also appreciate if it if I could be informed of the submission of the plan for public examination and/or adoption.

Yours sincerely,

Hayley Mason

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