

From:
To: [Site Allocations Plan](#)
Cc: [Latty, Cllr Graham](#); [Latty, Cllr Pat](#)
Subject: PDE02459_Aireborough - site allocation plan
Date: 16 November 2015 16:58:48

Dear Sir/Madam

I writing with regard to the Leeds Site Allocation Plan consultation process and in respect of proposed sites in Aireborough. I would like to formally register my objection to the proposed development of the Aireborough sites, and in particular in relation to the following sites:

HG2- 1 (Birks Farm, Ings Lane)

HG2-2 (Wills Gill)

HG2-3 (Shaw Lane)

HG2-4 (Hollins Hill)

HG2-5 (Coach Road)

HG2-6 (Silverdale)

HG2-9 (Victoria Ave, Yeadon)

HG2-10 (Gill Lane)

HG2-41 (Rawdon)

I do not agree with the proposed use of the sites. The themes I will be commenting upon (as per the format of the LCC response form) are:

- Ecology/landscape
- Loss of Greenbelt
- Highways/transport (road and rail)
- Schools
- Local services/facilities (e.g GP)

I do not consider the plans for the sites listed above to be sound. The tests of soundness that my comments relate to fall largely under the areas of Effectiveness and Consistency with National Policy. I have the following concerns:

- Loss of Greenbelt: you have failed to undertake a comprehensive Green Belt review prior to proposing building on these sites. The Green Belt is an environmental constraint under the NPPG. The Planning Inspector directed in the Leeds LDF Inspector's report that two key conditions were that consideration of *environmental constraints* (and infrastructure) needed to be addressed. This has not been done fully or effectively (on either count). The proposed use of Greenbelt land for housing development is not Consistent with National Policy i.e. it is inconsistent with Section 9 of the NPPF Protecting Greenbelt and contravenes the five purposes of the Greenbelt outlined in para 80 of the NPPF. This is particularly relevant to HG2-41.
- Ecology/landscape: Loss of green field has an equally important human cost; it is obvious to say, but once this land has been built on then the green, open space has been lost and there's no getting it back. Please think more laterally and longer term. I particularly have in mind HG2-1, HG2-3 and HG2-3; green space that the people of Guiseley can currently walk to, access on foot. Loss of these open spaces will impact on the landscape e.g. loss of natural views. I consider development of these sites to be unsound on conservation grounds. Please consider the health and well-being of the community and the importance of access to green space and nature. I would dispute that the housing

numbers or types suggested are required (the housing target of 2,300 for Aireborough is based on flawed statistics and has not been approved; therefore, the proposed developments are not justified). I also do not consider that, for other detailed below, the Aireborough area is the appropriate site for all these developments, but for what development is required, please look again at brown field options (even if these sites cost the housing developers more to develop).

- In addition, the proposed developments will mean that the settlements of Yeadon, Guiseley and Menston will effectively be merged. This will cause LOSS OF COMMUNITY IDENTITY. NPPF states that merging of communities is to be prevented, yet development of these green sites will lose the individual identities currently held between the areas in which they are located.
- Highways/transport: I do not consider that the traffic surveys have been conducted effectively i.e. at peak times. This concern particularly applies to sites HG2-1 to HG2-6 inclusive, as the proposed developments which will lead to increased traffic on both the A65 and the B6153 Park Road. There is no indication in any of the planning documents of LCC's proposals/solutions to mitigate the effects of increased traffic accessing and issuing from the proposed development sites, onto already extremely busy and often gridlocked roads. One further issue is that whilst the SAP suggests these are separate sites, some are in fact a string of sites (for example HG2-4, HG2-5 and HG2-6 are all linked and will all impact upon traffic on the B6153). The SAP for these sites fails the test of soundness on the criterion of effectiveness. As a commuter on the train from Guiseley into Leeds, I can assure you that the service is already groaning under the pressure of current population numbers; it is already almost impossible to get a seat at rush hour and no consideration seems to have been given for how several hundred (thousand?) more commuters who may wish to use the train are to be accommodated.
- Schools/GPs: LACK OF INFRASTRUCTURE. The numbers proposed are not sustainable in terms of demands upon services such as schools and healthcare, GPs etc. NPPF states that infrastructure must come first, yet the outline ideas to provide infrastructure are neither in place or time-lined in advance of the proposed developments. There are currently no plans whatsoever to develop new healthcare with the increased population. At best there is only marginal attempt to set aside land for education, but there is no schedule of timed completion and no consideration for who would build a school on this land. In all probability, this would not be progressed and would then be turned into yet more housing for any already over stretched population (see what has happened at High Royds).

Finally, I am not convinced that the Plan is legally compliant in the sense of consultation and duty to co-operate. I am a solicitor by profession (albeit not a planning/environmental lawyer) and I have found the process and paperwork involved in giving my response to be overly complex and almost designed to deter comment and feedback from the community who will be affected. If it were not for the Aireborough Neighbourhood Development forum and their voluntary role I do not think many local people in Guiseley etc. would have been very aware of the plans or felt enabled to comment at all. The format of the consultation has been alienating. In addition, you have not included the Aireborough Neighbourhood Area vision in your thinking for the SAP. I am not satisfied with the consultation and process used for this reason.

In conclusion, I consider the SAP has:

- Not been **positively prepared** (there is no provision for impact or improvement to social or transport infrastructure)
- Not **been justified** (the housing target is based on flawed statistics)
- Not been shown **to be effective**
- Not been shown **to be consistent with national policy** (notably, its use of Green Belt land is inconsistent with the whole of Section 9 of the NPPF Protecting Green Belt.)

The Site Allocations Plan for Aireborough and the sites detailed above must be considered unsound in light of all of the above.

Yours faithfully

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