

From:
To: [Site Allocations Plan](#)
Subject: PDE02472_Comments for Leeds Site Allocation Plan
Date: 16 November 2015 16:56:51

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The following comments are relating to the Leeds Site Allocations Plan.

Site Names & References:

Site HG2-17 (1080 & 3367A)	Breary Lane East / Leeds Road – 376 houses
Site HG2-15 (3400)	Land at Green Acres, Moor Road, Bramhope – 42 houses
Site HG2-16 (1002)	Land to the rear of 45 Creskeld Lane – 23 houses

I do not believe that any of these sites should be used for housing, and believe that the sites should be unallocated from the plan. My overriding concern is whether the use of green belt land is appropriate when there must be numerous brown field sites within the wider Leeds City environs. Each of these sites involves building on green belt land and using this land for housing does not meet any of the exceptional / special circumstance which would justify it being taken out of green belt. Have all brown field site elsewhere been allocated & if so does that not provide enough potential housing?

Below are my complete comments – which apply to all sites

Do you consider the plan to be sound:-

NO

Which test of soundness are your comments about:-

1. Positively Prepared
2. Effective
3. Justified
4. Consistency with National Policy

My comments are aimed at **ALL** the tests of soundness list above 1-4.

1) Positively Prepared /Effective / Justified

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- i) “The plan should be prepared based on the Core Strategy and infrastructure requirements should be taken into account”. The plans do not take account of the infrastructure needs of the village:

(a) Highways

- (i) The A660 is already overcrowded and congested at peak periods without adding any future traffic requirements.
- (ii) There will be a knock on impact from developments that are already in the pipeline or being proposed, in the South, North, East and West of the village from Adel, Otley, North Yorkshire and those from Aireborough and Rawdon as the A660/A658 are alternative routes from the congestion on the A65.
- (iii) The lack of employment opportunities in the village would increase cars and journeys made and would increase commuting traffic.
- (iv) There are no adequate crossing facilities around this proposed site
- (v) Cars and other traffic are not monitored for speed and often are over the 40MPH speed limit. Turning right from the roads opposite the site is already hazardous due to the volume of traffic.

(b) Schools:

- (i) There is a major capacity issue with the local primary school. This would be increased by a further burden of trying to accommodate new residents with children from this proposed housing development, in addition to the extra demand from those in other local neighbourhoods.
- (ii) Although the plans include room for a school, who is going to fund the school?
- (iii) What type of school and in the plans it does not give a view of how big a proposed school would be?
- (iv) It would seem likely with the volume of housing and therefore corresponding volume of children requiring school places that almost any size of school will still incur a shortfall of places.

(c) Public Transport

- (i) Public transport facilities for the village are inadequate, which leads to more traffic, particular from Ilkley/Otley/Harrogate as the A660 is a major corridor for those commuters to travel to Leeds.
- (ii) The provision of those facilities (bus travel) is not under the control of the Council but of First Bus Group, and the service they currently provide is not provided efficiently.
- (iii) The Traffic lights at the Dyneley Arms already cause major delays to the bus service, often turning up late.

(d) Medical facilities

- (i) The Medical Practice struggles to cope with the volume of residents in the village as it is.
- (ii) There are often waiting times of up to two weeks.

- (iii) Facilities for parking are not adequate around the facility, particularly during term and drop off/pick up times.

(e) Conservation/Heritage/Ecology/Landscape/Trees

- (i) This site is adjacent to the Bramhope Conservation Area
- (ii) It is also adjacent to a listed building (The Old Farmhouse).
- (iii) There would be an unacceptable loss of Green Belt and Green Fields, as the proposals currently will remove those sites forever.
- (iv) The landscape, including the loss of a number of trees would be unacceptable as this area currently provides stunning views of the surrounding countryside.
- (v) An ecological assessment of the site would need to be undertaken due to the nature of the boundary with Spring Wood and the hedgerow.
- (vi) When Local planning Authorities are considering any planning application, they are required to meet the criterion of Paragraph 88 of the NPPF and; “ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations”. This proposed site contains a substantial area of Green Belt. Fundamentally, therefore the site is contrary to Green Belt policy.

(f) Urban Sprawl

- (i) This site in particular would create a disproportionate increase in a village classified as a smaller settlement.
- (ii) Demographic Evidence – there is no up to date demographic evidence that supports the proposal for such a large scale increase to the village.

2) Consistent with National Policy

The plan should enable the delivery of sustainable development in accordance with all the policies in the NPPF.

It is evident that the above tests of “Positively Prepared /Effective / Justified” have not been satisfied and therefore, cannot be consistent with the NPPF.

What changes would be considered necessary to make the Plan sound?

All Brownfield sites in Leeds need to be exhausted before any consideration is given to Green Field sites.

There are a number of sites that have already received planning permission in Leeds but as yet have not been developed – why not and these should be part of the plan for the City.

Consideration needs to be given to infrastructure needs before any site is approved – i.e. School capacity (primary and secondary), determination of future highways demand and how this will be met. The ability of local primary health structure to meet the anticipated of current never mind future local population.

I would also suggest that the area of the site that is Green Belt can only been taken out of this categorisation if it meets, “Exceptional / Special circumstances “. The land identified in the site does not meet any exceptional circumstances, which could justify it being taken out of the green belt.

Do I consider the Plan to be legally compliant?

NO

Sustainability – the site is not sustainable and does not accord with the Strategic Policy SA2 0 i.e. seek to encourage development in locations that will reduce the need for travel, promote the use of public transport and other sustainable modes.

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Green Belt

Policy specifies that only in very special circumstances will approval be given in the Leeds green belt for:

- construction of new buildings for purposes of agriculture and forestry; essential
- facilities for outdoor sports and outdoor recreation; essential
- facilities for the park and ride sites shown on the proposals map; and other uses compatible with green belt purposes;
- limited extension, alteration or replacement of existing dwellings;
- limited infilling and redevelopment of identified major existing developed sites;
- Limited infilling in villages and limited affordable housing for local community needs.
- re-use of buildings, where all the detailed criteria of policy gb4 are satisfied;
- change of use of land for purposes which do not compromise green belt objectives;
- Cemeteries.

Further to my comments on the above I would also like to comment on five sites that were previously considered for housing but not allocated in the plan. These sites were coded red and I would not like to see them returning as housing sites:-

1181A – Land at The Sycamores Site A

1181B – Land at The Sycamores Site B

1204 - Land at Old Manor farm, off Old Lane, Bramhope LS16

- Land at Green Acres, Moor Road, Bramhope LS16 9HJ

3367B – Leeds Road, Bramhope Site B (Spring Wood).

The Comments for the 3 sites that are currently being considered apply to the above

sites also and therefore are unacceptable - please take my thoughts and comments into account.

Regards,
Richard