From:

To: <u>Site Allocations Plan</u>

Subject: PDE02476 The Leeds Site Allocation Plan

Date: 16 November 2015 16:56:38

Response to LDF Publication Draft Consultation Leeds Site Allocation Plan Section HG-2-1 (3026) New Birks Farm Ings Lane Guiseley.

I disagree with this site being used for housing. I do not consider the Leeds Site Allocation Plan to be sound for the following reasons:

The plan is not justified

- Leeds have not done a comprehensive Green Belt review as was asked for 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. (the real people that are affected)
- For each site Leeds have done a truly basic sustainability appraisal where they've researched the impact on the community and how new residents will access amenities. However this includes **no transport reviews or ecology reports** which are 2 main factors that local people are concerned and frustrated about! As a result of this relaxed approach the appraisal contains mistakes due to lack of research and local knowledge.

The plan is not positively prepared

- There are not enough facilities to cope with the number of houses proposed in Aireborough.
- The A65 is too congested now! Councillor Richard Lewis has admitted this already on "BBC Look North"
- No valid assessment has been done on the access to each site or the extra traffic it will create.
- Doctors and dentists can only just cope now.
- For each site Leeds have assessed what infrastructure is present now, but have not stipulated what would need to be in place to accommodate the new households.
- No housing needs survey has been done by Leeds, which leaves the potential for developers to maximise profits by constructing larger properties which will be unaffordable for the likes of first time buyers or homeowner's wishing to downsize.
- Leeds Housing target of 70,000 is aspirational, well in excess of Revised Office of National Statistic figures at 44,500. Even though Councillor Gruen admitted on TV in a "Made in Leeds" interview that the figure should be nearer 60,000. Still LCC will not change their target.

The plan is not effective

• It would appear that Leeds and Bradford are not collaborating their housing plans and the knock on effect with roads and traffic congestion. Developments in Menston, Burley and Apperley Bridge will impact on the A65. Not enough consideration is given to this.

Considerations Specific to Site HG-2-1 (3026)

There are 5 official greenbelt purposes

- 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.

This site fulfils 4 out of the 5 greenbelt purposes!! Development here will result in contravening point 1,2,3 & 5 and I would argue strongly point 4 also as a resident here for 11 years with an outlook across New Birks Farm, Ings Lane. (preservation of setting).

The site is in active economic use, Grade 3 agricultural land with a well trodden footpath through the area.

I enjoy the rural outlook with ability to see cows in the field opposite. It has recreational value with dog walkers using the footpaths, you see kids learning to fly kites with their parents, mountain bikers and runners and not forgetting blackberry picking from the mature hedgerows.

The site is identified in the Leeds Habitat Network and is home to diverse fauna.

19 trees have preservation orders and there are mature hedgerows. The trees are defined in the TPO's as adding to the landscape value and feature of intrinsic beauty.

We have seen whilst being here, deer in the fields on a number of occasions, each summer we have bats, there is a resident owl in the trees opposite, which line the boundary of this site which we hear hooting of a night and I'm sure enjoys hunting across the Ings fields. Kestrels, Frogs, Hedgehogs, common moles and numerous hedgerow birds to name but a few of the wonderful examples of nature that thrive on our doorstep. These will also be affected by Leeds plans.

The Ings defines Guiseley as a separate settlement to Menston, Mire Beck forming the boundary. Development would merge the two contrary to Greenbelt purpose.

It was a special landscape area in the 2006 UDP but seems to have lost its status.

The local infrastructure will just not cope with a new residential development, given to current congestion issues. At peak times you can have very long waits in traffic, trying to turn out of Ings Lane onto A65, turning right is a nightmare! Resident parking on Ings Lane is already tight. Both of these issues are compounded further on home match days at Guiseley FC and now that they have been promoted to league status they also have considerations of expansion they need to consider to conform to league rules. Doctors Dentist and School outlets have not increased in Guiseley, even with all of the new residential developments that have completed in the last 10 years. The infrastructure is creaking now, it will go towards breaking point!

LCC 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 and town councils designated to draw up neighbourhood plans. Many feel they have not been consulted fully in the whole site allocation process.

I found out of the 8 week consultation period and the LCC drop in meeting via a leaflet produced from a voluntary group not Leeds Council.

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 an advert in Aireborough on a phone in Guiseley which was taken down 3 weeks into the consultation!

Nowhere do any documents state that 90% of Aireborough's sites are on Greenbelt. The reference to Green Belt as Greenfield is misleading and suggests that land has already lost its Green Belt status.

A fully comprehensive Green Belt review hasn't been carried out as specified by the inspector at the Core Strategy Hearing. Frankly LCC's approach lacks transparency and in most industries regulators would be taking legal action for misleading parties concerned, however when it comes to key stakeholders like local residents it comes across that the council do not really care what they think!

LCC have not fulfilled their duty to cooperate

In their background paper of Sept 2015, one meeting is recorded with City of Bradford Council on 6th March. It is highly unlikely that all points for consideration were covered on which they should cooperate. Minutes for this meeting have been requested but have not been forthcoming.

In Leeds Local Plan, a comprehensive review of Green Belt should have taken place alongside Bradford as many of the Aireborough sites have boundaries with Bradford. There is no evidence this ever took place.

How LCC can improve the plan and make it sound.

- Reduce the Leeds housing target from 70K to 44K (ONS data)
- Abide by the National Planning Policy Framework (NPPF)
- Revise the plan adopting a better methodology eg. Brownfield first policy
- Have an infrastructure plan in place before site allocations plan.
- Build closer to areas with better infrastructure
- Build closer to where the bulk of jobs are, e.g Central Leeds
- Carry out a comprehensive Green Belt review
- Genuinely engage with local communities
- Cooperate and liaise with Bradford Council throughout the process.

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

Many thanks

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