

From: [Kit Hemsley](#)
To: [Site Allocations Plan](#)
Subject: PDE02661_Comments for Leeds Site Allocation Plan
Date: 16 November 2015 16:14:41

Comments for Leeds Site Allocation Plan

Name: ***Mrs Kathryn Hemsley***
Address: ***Dyneley Close, 40 Leeds Road,
Bramhope.
LEEDS
LS16 9BQ***

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 |

A) Site HG2-17 (1080 & 3367A) Breary Lane East / Leeds Road – 376 houses

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.

Reasons for why you think that the plan is Unsound:-

1) Positively Prepared / Effective / Justified

- i) Plans for the city and in particular for this site should be prepared against the Core Strategy and infrastructure taking all those elements into account. There are several flaws as to why the plan is NOT deliverable. The plans do not take account of the infrastructure needs of the village and they cannot be delivered:-

(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) Although the plans purport to have room for a school, who is going to fund the school?
- (ii) What type of school and in the plans it does not give a view of how big a proposed school would be?
- (iii) Having gone through the process of applying for primary schools and working with other parents in the village who have younger children than mine there is still a major issue of capacity – irrespective of the size of the school built. 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. It is evident from the annual process that the needs of all children in the village cannot be (and will not be met) and that they would have to travel out of the area to be educated, which in itself will add further burden to the transport system and highways.

(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 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 be 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.

-

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.

B) Site HG2-15 (3400) Land at Green Acres, Moor Road, Bramhope – 42 houses

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Reasons for why you think that the plan is Unsound:-

3) Positively Prepared /Effective / Justified

- i) Plans for the city and in particular for this site should be prepared against the Core Strategy and infrastructure taking all those elements into account. There are several flaws as to why the plan is NOT deliverable. The plans do not take account of the infrastructure needs of the village and they cannot be delivered:-

(a) Highways

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- (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 speed limit. In particular around this site the main road is not illuminated.
- (vi) Practicalities accessing other areas of the village such as the school/Medical centre and the shops would require travel by car.

(b) Schools:

- (i) Although the plans purport to have room for a school, who is going to fund the school?
- (ii) What type of school and in the plans it does not give a view of how big a proposed school would be?
- (iii) Having gone through the process of applying for primary schools and working with other parents in the village whom have younger children than mine there is still a major issue of capacity – irrespective of the size of the school built. 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. It is evident from the annual process that the needs of all children in the village cannot be (and will not be met) and that they would have to travel out of the area to be educated, which in itself will add further burden to the transport system and highways.

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Do I consider the Plan to be legally compliant?

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C) Site HG2-16 (1002) Land to the rear of 45 Creskeld Lane – 23 houses

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- (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.
- (vi) In particular to this site there are serious access issues. The road around this site is dangerous in winter months. It is not illuminated. The road is steep and not designed for further traffic as currently it is used as a cut through to and from Arthington.

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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.

Signed:

K H Hemsley

7) DATE: 16/11/2015