

From:
To: [Site Allocations Plan](#)
Subject: PDE02987_Fwd: Response to Leeds Site Allocation Plan
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LDF Publication Draft Consultation,
Forward Planning & Implementation,
Leonardo Building,
2 Rossington Street,
Leeds LS2 8HD

My Details:-
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I wish to comment on the Leeds Site Allocation Plan

I also wish to comment on the Council's handling of this Public Consultation process, which I feel has been totally inadequate, but I will leave those to the end, after I have listed the sites I am commenting on.

I OBJECT TO THE INCLUSION OF THE FOLLOWING LIST OF SITES, on these general grounds. Additional site specific reasons are given with individual site references:-

Tests of soundness:

Are the plans (for sites listed below) positively prepared - NO.

The council has failed to carry out a Comprehensive Greenbelt Review. For that reason alone, this plan should be rejected by the Independent Govt Inspector.

Are the plans (for sites listed below) justified - NO

Are the plans (for sites listed below) Effective - NO

Are the plans (for sites listed below) Consistent with National Policy - NO

Legal compliance of the plan:

The plan is not legally compliant because of the failure to consult statutory bodies eg. healthcare provision, education provision, transport, heritage, nature etc. It also fails to stick to the terms of the Statement of Community Involvement. There has been a failure to adhere to the Duty to Co-operate as evidenced by LCC's Background paper on this subject, where they record only one single meeting on 6th March 2015 with Bradford Council to discuss the SAP. In view of the fact that Aireborough region borders Bradford on at least half its perimeter and is officially classified as an urban/rural fringe area, one isolated meeting between the two authorities cannot possibly have been sufficient to determine the impact of both their plans.

The proposed developments on greenbelt protected and greenfield land will have a serious negative impact on my standard of living, as well as on the environment and should be excluded from the plans. My specific objections are as follows:

1. Inconsistent with National Planning Policy Framework:
 - I. INADEQUATE ENVIRONMENTAL CONSTRAINT: NPPF now states that the target level of housing development within the plans should be capped in line with the capacity of brown field sites to accommodate it, to protect and enhance greenbelt. The current plans significantly exceed this capacity; resulting in the permanent and unnecessary destruction greenbelt, which must be protected.
 - II. NON-EXCEPTIONAL CIRCUMSTANCE: NPPF states that greenbelt is to be protected and requires 'exceptional' circumstances to be built on. There is nothing exceptional about the council's plans to build on unspoilt land to meet their current housing target. The council's adoption of the self imposed Core Housing Strategy cannot be considered to be an exceptional set of circumstances, but is merely part of their scheduled housing building policy plan.
 - III. PRIORITISATION OF GREENBELT OVER BROWN FIELD: NPPF states that brown field sites are to be prioritised over the development of green field and greenbelt, but these plans offer up greenbelt in advance. The range of larger sites such as HG4-42 are all scheduled for phase one; in advance of many brown field which are allocated for housing. The greenbelt allocated for housing has also been selected in favour of all of the other available brown field land from across the region, which must first be included in the site allocation plan.
 - IV. LOSS OF COMMUNITY IDENTITY: NPPF states that merging of communities is to be prevented, yet development of these greenbelt sites will lose the individual identities currently held between the areas in which they are located. For example, several sites identified below currently act as the dividing space between the conurbations of Horsforth, Rawdon and Rodley, also Yeadon, Guiseley and Menston. If they are to house 100's of new properties as suggested, the urban sprawl will knit these areas together resulting in a loss of individual community identity.
 - V. LACK OF INFRASTRUCTURE: 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 these massive scale extensions of 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.

2. Inconsistent with Leeds Development Plan Policies:

I. LACK OF AFFORDABLE HOUSING: The need for large scale affordable housing and single owner properties will not be fulfilled by developing on sites on greenbelt land in semi-rural areas, but on the renewal of brown field land in areas in need of urban regeneration and investment. For example the three Horsforth sites listed below are in areas which command property values for new build currently starting at circa £325,000 (eg: Horsforth Vale); which is in no way part of a plan which prioritises the progression of affordable housing. The small percentage set aside for affordable housing within these premium area developments does not alleviate the issue in the way that urban regeneration should.

- II. DENIAL OF HOUSING TARGET RE-ASSEMENT NEED: The current housing target which drives the need to develop on the greenbelt is flawed and needs to be changed. It is based on outdated, over inflated housing targets which require that over 70,000 new properties are still needed. This urgently needs to be brought in line to the latest 2014 figures (from the Office of National Statistics), which show a need of only 46,000 new homes.
- III. DELAYING OF HOUSING TARGET RE-ASSEMENT NEED: In order to prevent the unnecessary permanent destruction of greenbelt, the current plan to re-assess the housing target needs to be put in place before the site allocation plans are progressed, and not after them - as currently planned.
- IV. UNSUITABILITY FOR SINGLE OWNER OCCUPANCY: Leeds' core strategy identifies a significant need for single owner occupancy housing (upwards of 40%), which will not be met by developing in the above sites. The developers will opt to construct multiple bedroom properties which sell for the highest profits, as evidenced in locally based sites, such as Horsforth Vale.

3. Negative Impact on Highway Safety and Traffic:

- I. COMPROMISING ON SAFETY: Several sites listed below are located on sections of the Ring Road and the A65 which are some of the most congested and dangerous in Leeds. Adding thousands of extra houses which all need to utilise these same stretches of road, will cause daily gridlock and increase serious accidents within this over burdened area.

4. Lack of Conservation of the Natural Environment:

- I. DESTRUCTION OF HABITATS: Some of the below sites are host to crested newts, different species of bats, owls, hawks, wild deer, badgers and a huge array of wildlife that will perish as a result of the proposed development. While there may be token provision allocated for selected species, the majority are not even noted or recognised in the inadequate environmental impact assessments which have been conducted to date.
- II. ISOLATION OF WILDLIFE: The sites below provide a continuous chain of greenbelt along the River Aire Valley and other natural areas, which

allow the wildlife migratory and residential access across the region. The destruction of these greenbelt sites will lead to their isolation, hemmed in by the proposed housing and Ring Road, leading to their permanent demise from the area.

- III. REMOVAL OF COMMUNITY ENGAGEMENT WITH COUNTRYSIDE: Loss of these sites to housing, will deny many local people access to the semi-rural landscape that is characteristic of the Aireborough region and surrounding areas

5. Negative Effect on the Landscape:

I. DESTRUCTION OF NATURAL VIEWS: as indicated below against individual site refs.

6. Lack of Co-operation with Neighbouring Councils (as already mentioned)

I. NO COHERENT REGIONAL CO-ORDINATION: The neighbouring satellite towns that accommodate a large percentage of the working populations of Leeds contain huge swathes of post industrial, derelict brown field sites that lay undeveloped. These ideally suited sites across Bradford, Halifax and Wakefield should first accommodate the excess housing capacity volumes, before the Greenbelt sites of Leeds are considered.

Sites In the Leeds Site Allocation Plan to which the above comments relate:-

HG2-1 (3026) New Birks Farm, Ings Lane, Guiseley

Building on this land would blur the boundary between Mention and Guiseley merging the two distinct and separate areas into one urban sprawl.

HG2-2 (3029) Will's Gill, Guiseley

It is an absolute disgrace that this has been included in the SAP, being adjacent to the conservation area of old Guiseley and essential to be kept green to maintain the unique historic and rural character of the area. There's also been a total failure to complete proper wildlife and flooding surveys of the area - local people know better about this and have not been consulted!

HG2-3 (1255B) Shaw Lane (land at), Guiseley and Banksfield Mount, Yeadon.

Outline planning application for house building on part of this site was refused in 1993.

Many local people use footpaths and bridleways on this site. Inclusion in the plan would mean loss of a valuable amenity. The site looks across to Deipkier Woods - known to be a very old coppiced woodland, building here would cause significant deterioration to the landscape setting of the area and woods especially. Queensway is already very busy with heavy traffic.

HG2-4 (4020) Hollins Hill and Hawkstone Avenue, Guiseley

Loss of this agricultural land will reduce employment in the farming sector. Traffic around this site is very heavy already.

HG2-5 (1180A, 1311A, 2163A) Coach Road/Park Road, Guiseley

The plan to put a school on this site is totally inadequate planning due to the section of unadopted, unsurfaced road connecting the Coach Road with Park Road, Guiseley. This will not provide suitable access to an education facility. It is my belief the council/developers are well aware of this and intend to just fill the

space entirely with housing for the sake of profit.

The combined fields comprising site HG2-5 is an integral part of the landscape of Guiseley. The current vista from the Coach provides views of the natural landscape stretching down towards Esholt Woods. If developed on, this connection local people have with their natural environment will be lost forever. Hundreds of people use these fields to access the woods below for leisure and recreation and have done so for all of living memory.

HG2-6 (1113) Silverdale Avenue (land at), Guiseley

Although this site is not greenbelt, it is ridiculous to propose building on allotments when they have such value/demand within the local community for health benefits, wildlife and reduction of waste and pollution through recycling of matter which might otherwise end up in landfill.

HG2-9 (3366) Land at Victoria Avenue.

Traffic congestion. Loss of greenbelt adjacent to Tarn Park nature reserve.

HG2-10 (1221) Gill Lane, Yeadon

This site was a successfully defended piece of greenbelt in 1994.

Building on this site would merge Nether Yeadon with Henshaw and the Westfield Estate.

Nether Yeadon is now a designated conservation area, at the time of this being designated, Historic England and local MP Stuart Andrew argued for these fields to be included as part of the conservation area. I believe the council refused this because they already intended to allow house building on it and not for the stated reason that inclusion of these greenbelt fields would "dilute" the conservation area aspect. What rubbish.

Development of this site is not in accordance with the NPPF because it fails to protect greenbelt, fails to conserve the natural environment and fails to conserve the historic environment. This site has 21 mature trees, mostly native and including two rare species of exceptional landscape value and note:- a black (or railway) poplar and a red oak. The council have failed to carry out a comprehensive tree survey so will not be aware of these facts.

This site supports a wide range of wildlife, including owls, Red Kite, woodpeckers and bats.

This site is historic pasture land as evidenced by the remnants of old hedgerows, indicating much smaller field divisions from a former period. Further evidence has been shown from maps dating to the 19th C, which delineate and name the smaller, original field divisions.

The council's assessment of this site, mentioned only one nearby listed building, in fact there are 12 listed buildings within the Nether Yeadon conservation area. This area is known to be a rare example of a pre-industrial revolution landscape and as such it should not be damaged by excessive development right on its periphery.

The section of the A65 road adjacent to this site is particularly congested. There has not been an adequate survey carried out to determine the impact of this and other nearby developments on traffic numbers.

Local schools are at capacity along with healthcare provision etc.

HG2-12 (4254) Woodlands Drive, Rawdon

This site bordering the conservation area of Cragg Wood, is an important buffer for preservation of the character of the local area. Knott Lane is used by traffic exiting the crematorium and is not suitable for coping with a large scale development such as this.

There are basic errors in the council's site sustainability and greenbelt assessment for this site. Local schools cannot cope with increased demand on places.

HG3-1 (4043) Ings Lane, Guiseley

HG3-2 (4095) Land to West of Knott Lane, Rawdon

HG3-3 (3331) Land at Rawdon

HG3-4 (3329, 5145) Layton Wood, Rawdon.

HG2-15 (3400) Green Acres and Equestrian Centre

HG2-41 (4240) - Fields South of A65 from Horsforth & Rawdon RA to crematorium

REMOVAL OF COMMUNITY ENGAGEMENT WITH COUNTRYSIDE: This site is used both as working agricultural land and also as Pick Your Own fruit fields. During the fruit picking season, the fields provide thousands people from the local community with a meaningful way to connect with the natural environment.

Literally hundreds of families, many with small children arrive each week to pick their own strawberries and raspberries with all the health, education and sustainability opportunities that provides (e.g. reduced food "miles")

The combined fields comprising site HG2-41 (4240) is an integral part of the landscape of Horsforth and Rawdon. The current vista from the A65 provides views of the natural landscape stretching through the Aire Valley right up towards the distant hills of Shipley Glen. If developed on, this connection local people have with their natural environment will be lost forever.

HG2-42 (1016) - Fields at Broadway and Calverley Lane, Horsforth

HG2-43 (5009) - Fields at Horsforth College Campus

This site was previously used solely for education provision and as such it is ideal for a new school, so desperately needed in the area. The access is good and safe so would perfectly suit a school for any age group of pupil. This would enable some green space to be retained for the benefit of the community and it's wildlife etc. Part of this site is already listed as a nature reserve.

HG2-49 (3376) - Off Weetwood Avenue, Headingley

HG2-119 (2062) Red Hall Playing Fields, LS17

The loss of this local amenity would be a disaster for local people. It is accessed by many for health benefits of exercise and fresh air. Dr Ian Cameron, Director of Public Health says that the plans to build 70,000 more houses in Leeds should be developed to IMPROVE public health and well being. So how is the destruction of a facility for healthy outdoor exercise in an area already short of school playing field facilities going to do that? It will not in other words, it will make health inequalities worse for local people. In addition to putting yet more traffic on the roads and increasing environmental pollution.

On these and other grounds, I sincerely hope that you are able to act on my behalf and reject the progression of these greenbelt and greenfield or open sites within the development proposals.

COMMENTS ON THE INADEQUACY OF THE PUBLIC CONSULTATION PROCESS:

- I. **WEB SITE OBSTRUCTIVENESS:** The council's consultation feedback website does not allow for the objections of greenbelt development across Leeds. The method is divisive in that it forces the user to focus only on sites on an individual field by field basis, making the commenting of objections to all proposed sites an impossible task. The online form is difficult to find and almost impossible to understand, written in planning jargon that is not accessible to most of the public. Several times during the consultation period, the website was down or the form displayed errors, making it extremely difficult to complete successfully. The so-called interactive map of sites, was difficult to navigate and didn't even show site ref numbers! The documentation was verbose, filled with complex jargon, with no simple guidance to make it accessible to the general public.

- II. **LIMITING ACCESS TO INFORMATION:** There is nowhere in the council's published documentation that provides a clear list of greenbelt sites which are nominated for development. They are hidden in isolation amongst the wide array of other sites, making them inaccessible to the public.

- III. **LACK OF PUBLIC AWARENESS:** Less than 30 members of the public attended the councils' largest scale opening exhibition held in the Grand Hall of the Civic Centre. There have been no visible letters sent to households across Leeds, no TV campaign, no radio campaign, no social media, no newsletters via schools, nothing. As a result, the vast majority of the people of Leeds have not been given the opportunity to comment on issues that affect them. At least one member of the public who contacted LCC was given the **WRONG** information, as to what email address to use. The Council has put all their information (which is ridiculously over-complicated and full of incomprehensible jargon) on line, or in libraries where it has not been displayed in a user-friendly manner. By emphasising their preference for comments to be made online, they have effectively excluded a huge swathe of the population, that has no internet access. Persons with any sight disability or mobility issues that make it difficult from them to get to libraries etc, have absolutely no chance to engage with the consultation process.

Please keep me informed of opportunities to present my objections to the planning panel, the public examinations, the submission of the plans and potential outcome of the review.

Yours faithfully
Sarah Luty