

PDH00392

10 London Lane  
Rawdon  
Leeds  
LS19 6BR

1<sup>st</sup> November 2015

LDF Publication Draft Consultation  
Forward Planning & Implementation  
The Leonardo Building  
2 Rossington Street  
Leeds  
LS2 8HD

DEVELOPMENT DEPARTMENT			
To	Action	Info	File
- 5 NOV 2015			
File Number			

Re – Site Reference HG2-10 / Gill Lane Yeadon

Dear Sir / Madam,

I am writing to object to the development of the site referenced above. I have lived in Yeadon for 47 years and Aireborough has already taken 2400 new homes in the past 10 years and there have been NO improvement plans to support these proposals.

My objection is based on the following -

- The plan for the site was not positively prepared. It is not based on a comprehensive Greenbelt Review nor does it take into account our needs as a community or with our full involvement.

- These plans are UNSOUND and without local action groups we would not have been aware of these proposals. The local library (Rawdon) were supplied the wrong maps which is misleading and inaccurate (Aire Valley maps not Aireborough). The Council POP ups were not advertised locally and we received no literature through the door. 35% of the Leeds population have been omitted from this consultation because they are not on line – this makes it legally non compliant.

- This site was defended as Greenbelt in 1994 and this historic pastureland which has over 21 mature and rare English Trees – including Red Oak is still farmed. It's a wildlife rich habitat (home to owls, badgers, woodpeckers and bats) adjacent to a Conservation Area and according to Historic England this site should be part of it. They state it is an "UN SOUND" proposition for development. Copy attached.

**"this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 133 or 134)" Historic England in their details to LCC 21/10/15**

- This proposal is UNJUSTIFIED and would merge Nether Yeadon with Guiseley and Henshaw. It is part of continuous greenbelt between Leeds and Bradford and prevents urban sprawl between the two. The Council omitted the inclusion of a series of listed buildings along the perimeter and has acknowledged ONLY one listed building.

- This proposal is not LEGALLY COMPLIANT and is NOT in accordance with the NPPF. The housing target of 70,000 on which the Council has based its Core Strategy is inaccurate and over aspirational and the Council has not revised these figures despite ONS projections of 45,000. The Council has also IGNORED the NPPF which states that green belt only be used in "exceptional circumstances".

- The green space of Gill Lane is a vital space that increases the biodiversity and sustainability of the local area - absorbing noise and providing drainage systems and countering pollution.

- The impact on already stretched resources would be huge – schools, doctors, dentists - and there would be a huge impact on local roads, traffic levels, and state of, not to mention road safety issues.

- There are plenty of opportunities for housing around Leeds in EXISTING buildings, premises and land that are currently derelict and empty, and which would be MORE suitable for housing – the infrastructure is already there to support these.

Between 2004 and as at September 2015 (15,327) there have been between 15,000 – 17,000 empty properties city wide. (Data from LCC Data Mill). The Council are effectively allowing developers to cherry pick the most desirable and profitable sites without any consideration for communities.

This proposal cannot be take in isolation. Yeadon, Guiseley, Rawdon and Horsforth are all being subject to this unjustifiable plan and all our green spaces are being threatened because of it. This is unacceptable and wrong. Section 9 of the NPPF serves to protect greenbelt and this is being ignored by Leeds City Council across Aireborough.

Too much green space is being used to meet unproven targets, and sites are being allocated that contravene NPPF guidelines.

These developments are inconsistent with both National Policy and the Core Strategy and site HG2-10 – locally known to our community as Gill Lane – should not be included.

Regards

Erica Ward

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Forward Planning & Implementation,  
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2 Rossington Street,  
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LS2 8HD

Our Ref: HD/P5114/04  
Your Ref:  
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21 October 2015

Dear Sirs,

**re: Leeds Local Plan – Site Allocations Plan: Publication Draft**

Thank you for consulting Historic England about the latest iteration of the Site Allocations Plan. We have the following comments to make regarding its contents:-

#### **General comments**

Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. This means that the plan, as a whole (including the sites it is putting forward as allocations), has to set out a framework which is likely to conserve the historic environment of the Plan area.

The Sites Allocations Local Plan proposes a large number of sites for development which could harm elements which contribute to the significance of the City's heritage assets. There are, for example:-

- 11 sites which involve the loss of open spaces adjacent to Conservation Areas,
- 6 which involve the loss of open spaces within Conservation Area,
- 8 sites which involve the development of open spaces in the vicinity of Listed Buildings,
- 6 more where the development of an open space could impact upon both a Conservation Areas and Listed Building,
- One which seems likely to directly impact upon a Scheduled Monument, and
- A large Urban Extension in the vicinity of a Grade I Historic Park and Garden

The Allocation of a site for development in the Local Plan is, as Paragraph 2.52 of Section 2 of the Plan makes clear, "establishing that the site is suitable for that use" and, therefore, that the principle of development in those particular locations is acceptable. However, in the case

Page	Site	Sound/ Unsound	Comments	Suggested change
			<p>provisions of the 1990 Act, or the requirements of the NPPF.</p> <p>Before allocating this area, therefore, there needs to be an assessment of the contribution which this currently-undeveloped area makes to the character or appearance of the Conservation Area, and what effect the loss of this site and its subsequent development might have upon the elements which contributes to its significance.</p>	
61	HG2-10 Gill, Yeadon	Unsound	<p>This area adjoins the boundary of the Nether Yeadon Conservation Area. The Conservation Area Appraisal identifies a number of key views from the Conservation Area across this site. In addition, there are a number of Listed Buildings to the south of this site.</p> <p>By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the character of the Conservation Area or to the setting of the Listed Buildings or what harm might result to those elements which contribute to the significance of this designated area by its eventual development .</p> <p>Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition, the</p>	<p>(1) An assessment needs to be undertaken of the contribution which this site makes to the elements which contribute towards the significance of the Conservation Area and Listed Buildings and what impact the loss of this undeveloped site and its subsequent development might have upon those significances.</p> <p>(2) If it is considered that the development of this site would harm elements which contribute to the significance of the Conservation Area or Listed Buildings, then the Plan needs to set out the measures by which that harm might be removed or reduced.</p> <p>(3) If, at the end of the process, it is concluded</p>

Page	Site	Sound/ Unsound	Comments	Suggested change
			<p>Council has a statutory duty under the provisions of S72 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay “special attention” to “the desirability of preserving or enhancing the character or appearance” of its Conservation Areas. The NPPF makes it clear that the significance of heritage assets, such as Conservation Areas, can be harmed through development within their setting.</p> <p>In the absence of any assessment of the degree of harm which this proposed Allocation might cause to the Conservation Area or the Listed Buildings or, indeed, what measures the Plan might need to put in place in order to ensure that this harm is minimised, the Plan cannot demonstrate that the allocation of this area is compliant with, either, the statutory duty placed upon the Council under the provisions of the 1990 Act, or the requirements of the NPPF.</p> <p>Before allocating this area, therefore, there needs to be an assessment of the contribution which this currently-undeveloped area makes to the character or appearance of the Conservation Area and to the setting of the nearby Listed Buildings, and what effect the loss of this site and its subsequent development might have upon the elements which contributes to its significance.</p>	<p>that the development would still be likely to harm elements which contribute either to the significance of the Conservation Area or the Listed Buildings, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 133 or 134).</p>