

PDH 00 478

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LDF Publication Draft Consultation  
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DEVELOPMENT DEPARTMENT			
To	Action	Info	File
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LDF Publication Draft Consultation Leeds Site Allocation Plan  
Section HG-2-1 (3026)New Birks Farm Ings Lane Guiseley and HG-3-1 (4043) Ings Lane Guiseley.

Dear Sir,

As a resident of Netherfield Road and former business proprietor in the same locality, as well as a Teaching Assistant at a prominent local primary school for 25 years I must disagree with these sites being allocated for housing .

In my opinion the Leeds Site Allocation Plan is flawed .

**The plan is not justified**

- \* LCC have not done a comprehensive Green Belt review as was asked for by the inspector of Core Strategy. They have only reviewed Green Belt Sites which were selected for development.
- \* LCC have not involved communities in the drawing up of their plans.
- \* For each site LCC's sustainability appraisal has not researched how each site will impact on the community and how the new residents will access amenities .there are no transport reviews or ecology reports and contain 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 congested – a fact Councillor Richard Lewis has admitted on BBC "Look North."
- \* No real assessment has been done on the access to each site or the extra traffic it will create .
- \* Doctors and dentists can only just cope.
- \* For each site Leeds have assessed what infrastructure is present, but appear to have overlooked how the present facilities will need to change to cater for the additional households.
- \*No housing needs survey has been carried out, either to reflect the needs of first time buyers, couples seeking to downsize, or to continue the character of the existing residential communities adjacent to the proposed developments.

\*Leeds Housing has set a target of 70,000 new homes for the city, but this is significantly at odds with revised ONS figures which indicate that the requirement is likely to be nearer 44,500. However LCC are adamant that their forecasts are more reflective of the perceived needs of the city, even though Councillor Gruen has opined in a 'Made in Leeds' interview that the figure is probably nearer 60,000 dwellings. With such wide variations in forecast requirements Leeds Housing need to set out the detailed rationale for their assumptions and subject these to independent scrutiny-a lower target could reduce the amount of Green Belt needed to fulfil the plan.

### **The Plan is not effective**

Aireborough is an area which borders both Leeds and Bradford council boundaries, yet no collaboration between the councils appears to be taking place in planning projected housing developments, especially where these will impact on roads such as the A65, which are already congested throughout much of the daytime, seven days a week. A new housing development in Menston or Burley will feed traffic into Aireborough's roads, yet little consideration has been given to this.

### **Site-specific considerations**

#### **1)HG-2-1(3026)**

The land on which this development is proposed is designated currently as Green Belt-such areas are deemed to serve five official purposes:

- \*to prevent uncontrolled spread of large built-up areas
- \*to prevent neighbouring communities from merging into one another
- \*to assist in safeguarding the countryside from urban 'creep'
- \*to preserve the setting and special character of historic settlements
- \*to assist in urban regeneration, by encouraging the recycling of e.g. derelict and former industrial sites

In my opinion this site fulfils four out of the five criteria:

- \*development will lead to urban sprawl
- \*two communities with individual characteristics-Guiseley and Menston-will be 'seamlessly' merged along Mire Beck
- \*the immediate countryside is safeguarded from encroachment
- \*if this site is spared from development Brownfield sites in Leeds can be regenerated as more easily prepared Green Belt land will not be available

In addition:

- \*the site is in active economic use as Grade 3 agricultural land
- \*Leeds Habitat Network defines the site as home to diverse fauna

\*19 trees have tree preservation orders which define them as adding to the landscape and a feature of intrinsic beauty.

\*Mire Beck is the natural boundary between two distinct local settlements, Guiseley and Menston. It is also nature's 'drain' to take away floodwater from the streams (Ings) which permeate the area as 'storm gullies' to take excess water from the Chevin in times of heavy rain/snow-hence the fields on which development is proposed are a mini 'flood plain', as witnessed by the fact that the beck overflows into these fields on a regular basis. In recent times the poor state of the local sewers has seen Mire Beck polluted with sewage from time to time-a problem that YWA seem unable to solve, and one that can only be exacerbated by the proposal of more housing developments in the area.

\*The local infrastructure has not itself been the subject of a co-ordinated and comprehensive development plan to meet new housing developments which have taken place over the last ten years. Any local resident will tell you of the problems regarding capacity at local doctors and dentists-two local primary and junior schools have had to have plans drawn up to extend to be through schools, but only one scheme has been completed to date, and what is intended for the local secondary schools? Meanwhile, whilst the problems of congestion on the A65 are well documented, local roads continue to be treated as 'rat runs' by many drivers passing through the area, especially Netherfield Road and Ings Lane, with many drivers regularly exceeding the statutory speed limits with impunity, and it can only be a matter of time before a serious accident occurs, maybe with loss of life. Before embarking on grandiose housing developments LCC need to improve the safety on the above-named roads with traffic-calming measures, and, on Ings Lane, parking restrictions and some limited road widening, not least for the safety of existing, let alone new, residents.

\*Aireborough has already shouldered its fair share of development projects since 2000, and, as factories have closed, local job opportunities have disappeared, not to be replaced, and virtually all brownfield sites have been used up.

## **2)HG3-1(4043)**

Although this area has reportedly been declassified as Green Belt, it remains valuable and regularly used agricultural land, and part of a landscape which, taken as a whole, forms an impressive vista of a characteristically Yorkshire scene. As with the other proposed development site on Ings Lane, a number of the drawbacks to development here apply, especially with relation to local roads and to the Mire Beck (the field is home to many underground feeder streams to the beck as a soakaway with groundwater from the Chevin, and tends to flood along its lowest level every winter)-in addition it often acts as a breeding ground every spring for ground nesting birds such as lapwing. In addition in April 2008 it was reported that heavy rains had caused severe sinkage of some of the graves in Guiseley Cemetery on land just above where this development is proposed, which further underlines the problems with surface water drainage coupled to this site.

In my opinion the plan in its current form is not legally compliant, for two main reasons:

### **1)LCC have not fulfilled their duty of Community involvement**

\*The council's policies of community involvement were written in 2007, and are now out of date, in that they do not include the duty to collaborate with forums and parish and town councils designated to draw

up neighbourhood plans. There seems to have been little or no attempts at consultations at local level in the site allocation process, so the local community has been left at a loss as to what is being proposed, and, thus, how to respond. In fact the drop in meeting with Leeds Housing representatives at Guiseley gave me, and a number of other attendees the distinct impression that the matter was a done deal as far as LCC were concerned, and that a far worse situation would arise if the proposals were rejected!

\*It was left to a leaflet from ANDF to inform me that LCC were holding a drop in meeting in Guiseley, and of the eight week consultation period.

\*There has been no comprehensive Green Belt review carried out as specified by the inspector at the Core Strategy hearing.

## **2) LCC have not fulfilled their Duty to Cooperate**

The background paper dated September 2015 only records one meeting with the adjoining Bradford Council, on 6 March 2015, and, for unspecified reasons, no minutes appear to be available of that meeting. The Leeds Local Plan should have indicated that a comprehensive review of Green Belt had taken place in conjunction with Bradford, but there is no evidence to show this has occurred

After all that has been said can the plan be made sound? In my opinion I believe it can as long as LCC constructively addresses the following matters:

- \*Reduce the overall housing target for the city from the current 70,000, and clarify beyond all doubt how the new target has been arrived at
- \*Abide by the National Planning Policy Framework
- \*Apply a different methodology to the plan by, e.g.:
  - i) starting with Brownfield sites first
  - ii) prioritise developments in areas with better infrastructures, e.g. nearer the motorway access points in south and east Leeds.
  - iii) build closer to areas where the majority of jobs already exist or are to be created, e.g. Central and South Leeds-this would also benefit carbon emissions in the city as people will not need to travel so far to their places of work, and cut traffic congestion.
- \*Have a comprehensive infrastructure plan in place before allocating developments to specific sites, e.g. consider the interaction between site allocations and the development of a guided public transport system for the city.
- \*Carry out a comprehensive Green Belt reviewed
- \*Genuinely and open-mindedly engage with local communities, listen to their experiences and constructive suggestions, and incorporate these into the plans.
- \*Cooperate, and be seen to be cooperating, with Bradford Council.

I would like to attend the inspector's hearing. In the meantime please acknowledge this response.

I would also be obliged if you could inform me when the plan has been submitted for public examination and /or its adoption.

Yours faithfully

J Gillow (Mrs)

5.11.2015.