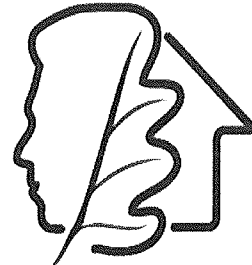


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Adel Neighbourhood Forum
Giving You a Voice

c/o 1 Park View
Adel
LEEDS
LS16 8DF

5th November 2015

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

Dear Sir / Madam,

Leeds City Council- consultation on Site Allocation Plan

I wish to comment on the Leeds Site Allocation Plan on behalf of Adel Neighbourhood Forum.

Sites already in the plan

Plan ref	SHLAA	Address
HG1-72	1033	Government Buildings Site Lawnswood
HG1-73	1299a	Bodington Hall
HG1-74	687	Dunstarn Lane
HG1-60	685	Tile Lane Eastmoor

Adel Neighbourhood Forum accepts that these are brownfield sites and would wish to see these sites used before consideration is given to any other sites in Adel. We believe that Adel's allocation of new housing can be fully met on these brownfield sites.

There are repeated concerns being expressed by the local community to ensure infrastructure needs are being addressed around school and highways capacity, health and social care. These are current concerns for Adel in the light of recent development, let alone before the agreed sites are fully developed. We would also wish to make reference to the Housing Market Needs Assessment (June 2014)

commissioned by Leeds City Council through the instigation of Adel Neighbourhood Forum. This report supported the need for a mix of housing in Adel particularly in addressing the need for smaller houses either as start-up homes or for older members of the community to downsize. The report has not yet been endorsed by the council for reasons that are not clear. Developers have continued to minimise the need for smaller housing units in a high profit area such as Adel despite the need for smaller units being the clearly expressed wish of the local community.

We would also wish to acknowledge that Site HG1-60 Tile Lane, Eastmoor is a complex site consisting of the Old Adel Reformatory, a Grade ii listed site alongside the recently completed Adel Beck Secure Children's Home.

We believe that by accepting these sites, the challenges of Site HG1 60 and the previous development at Centurion Fields, Adel will have taken its fair share of housing development totalling nearly 400 units.

Additional sites neighbouring on Adel that are of direct relevance to the needs of our community and which we would recommend for development.

Plan ref.HG2-34 Farrar Lane

Plan ref HG2-30 Site of the Eyrie Pub, Holtdale Approach

Plan ref. HG2-31 Land at the corner of Otley Old Road and Holtdale Approach

Plan ref. HG2-32 Cookridge Fire station, Otley Old Road

1) Plan ref.HG2-34

Farrar Lane 16 units

This site just outside the Adel Neighbourhood Plan area is currently a car park at the top of Farrar Lane. As such it is considered a brown field site. We would support this site and adjoining sites being used to provide purpose built accommodation for older people; but only with an active commitment by the council to ensure that infrastructure need is addressed in terms of adequate health and social care provision.

2) Plan ref HG2-30 Site of the Eyrie Pub, Holtdale Approach 14 units. Similar position as in HG2-34

3) Plan ref. HG2-31 Land at the corner of Otley Old Road and Holtdale Approach (next to the Tinshill BT Tower known locally as the Cookridge Tower) 15 units

4) Plan ref. HG2-32 Cookridge Fire station, Otley Old Road 15 units. It is proposed that this site will be vacated when the Fire Station is relocated on the Weetwood Police Station site on Otley Road.

By utilising these sites, the need to use green field sites is further reduced within the area.

Comments on sites currently proposed for development

We object to the proposals for development on the following sites

Plan ref. HG2-18, Church Lane, Adel Capacity 58

This is the land opposite the Parish Church of St John the Baptist, Adel which was turned down for a planning application in November 2014. The potential development of this site was previously examined by a Government Inspector as part of the Unitary Development Plan in 1999, as a result of which clear parameters for any future development were set out, in terms of protecting the setting of the Grade 1 Listed Parish Church of St John the Baptist.

Heritage

It is this site that, due to its proximity to the church, has caused the most feeling within the local area with a recognition that if built on, the setting will irrevocably be changed. It warrants particular attention in terms of its history dating back to 1150, and has national and international significance. Building development opposite will indelibly change the characteristic nature of the landscape. This was acknowledged by the UDP Inspector's report in 1999 in which it was said, in referring to Adel St John's Church, that 'the preservation of its setting is of unchallenged importance'.

Highways

The revised planning applications envisage that traffic access to and from the two sites will be split with traffic from the land to the rear and north of the Willows accessing Otley Road opposite Kingsley Drive. The A660 Otley Road is one of the most congested roads in Leeds. It is proposed that traffic from the site adjoining Centurion Fields will exit onto Church Lane via Holt Avenue, opposite Adel Sports and Social Club. We do not consider these traffic proposals sustainable.

In addition we anticipate that this situation is likely to be compounded if housing to the north, east and west of Adel in Bramhope/Otley/North Yorkshire/Bradford, and if proposed development in and around Leeds/Bradford Airport goes ahead adding to congestion on the A660 with motorists using Church Lane as a cut through to avoid the major road.

Greenbelt

Part of this site is in greenbelt. The proposal to take this land out of greenbelt is contrary to the National Planning Policy Framework.

Drainage

There are serious concerns regarding flooding that could arise from this development. All new developments should have soft rather than 'hard' engineering solutions wherever possible (Sustainable drainage systems).

Schools:

Despite the significance of the heritage of this site that has been recognised by Historic England it is recommended by the City Council that this site should include provision for a school.

The issue of school capacity is one of the most pressing issues within the local area but we do not believe that this site should be used for the reasons listed above.

Local consultation

In consulting on the draft neighbourhood plan, most of the Adel residents who responded were strenuously opposed to this site being used for housing development.

Plan ref. HG2-38, Dunstarn Lane Capacity 68

This site, located in greenbelt, is south of the main residential area of Adel, sloping towards the Ring Road. Development of the site is considered by Leeds City Council to 'round off' the existing built up area. Access would need to be through HG1 -74.

Greenbelt

The proposal to take this land out of greenbelt is contrary to the National Planning Policy Framework.

Schools

We have already identified that there are issues of capacity within the two local primary schools.

Highways

Any development on this site is likely to exacerbate traffic congestion at peak times at the Adel Lane/Long Causeway junction.

Unallocated Sites

We support the designation of the following sites as not being suitable for development and agree that they should remain unallocated.

Back Church Lane- former Rectory Paddock	Site ref.1243
Back Church Lane- former Rectory Paddock	Site ref.1246
Otley Road, former Bodington Hall site	Site ref.1299
Tile Lane	Site ref.2052
Cookridge Golf Club (south)	Site ref.3360A
Cookridge Golf Club (north)	Site ref.3360B
Land east of Sadler Way	Site ref.4157
Eccup Lane	Site ref.4153
Otley Road, Adel	Site ref.4159
Adel Mill	Site ref.4160
Otley Road	Site ref.4161
Land at Eccup Lane	Site ref.4251
Long Causeway	Site ref.1079
Dunstarn Lane (Land south of)	Site ref.1178B
Lawnswood Arms	Site ref. not stated

Soundness of the Plan

The plan does not meet the following tests:

Not positively prepared- It does not take account of infrastructure

Not justified- the strategic aim should be reuse of brownfield before green field and green belt.

Not effective- many of the sites are not suitable particularly as the infrastructure is not in place and cannot be delivered, e.g. no space for schools, roads already congested.

Not consistent with national policy- As the above tests have not been satisfied it cannot be consistent with National Planning Policy Framework.

To make the plan sound all brownfield sites in Leeds need to be exhausted before any consideration is given to greenfield sites.

Consideration needs to be given to infrastructure need before any site is approved e.g. school capacity- primary and secondary, determination of future highways demand and how this will be met, ability of local primary health structure to meet anticipated needs of local population.

None of the sites in Adel that are proposed to be taken out of the green belt meet the Exceptional Circumstances or Special Circumstances that need to be in place before this can happen. In Leeds case, the land does not meet any exceptional circumstances which would justify it being taken out of green belt.

Take part in the public examination

I would be grateful if you would note that Adel Neighbourhood Forum is willing to participate in the public inquiry before the Inspector.

Future updates

Adel Neighbourhood Forum would wish to be notified of the submission of the Plan(s) for Public Examination

Adel Neighbourhood Forum would wish to be notified of the Adoption of the Plan(s)

Ian Bond
Co - Chair

On behalf of Adel Neighbourhood Forum

5th November 2015