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DEVELOPMENT DEPARTMENT			
To	Action	Info	File
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36 Ings Lane,
Guiseley,
West Yorkshire,
LS20 8DA.

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

Sunday 8th November, 2015

Response to LDF Publication Draft Consultation

Leeds Site Allocation Plan

Section HG-2-1 (3026) New Birks Farm, Ings Lane, Guiseley

Dear Sir/Madam,

I am writing to you to express my strong disagreement with this site being used for housing. I do not consider the Leeds Site Allocation Plan to be sound for the following reasons.

(1) The Plan is not justified.

Leeds City Council (LCC) have not done a comprehensive Green Belt review as was asked for by the Inspector of the 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 the plan contains mistakes due to lack of research and local knowledge. As a long time user of the rail link to Leeds, I have direct experience over a sustained period of overcrowding – often it is not possible to get a seat on trains.

(2) 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, with queues already commonplace. Councillor Richard Lewis has admitted this 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. Our Dentist went private a few years ago, and owing to the great difficulty in finding another dentist, we had to go private. It is already difficult to get a prompt appointment with the Doctor in Guiseley.

For each site Leeds have assessed what infrastructure is present now, i.e. how far is the site away from a school, bus stop, a train station, a doctor's surgery, and made no recommendations as to what needs to be put in place to accommodate the new households. As I mentioned above, things are already stretched to the limit.

Leeds have not done a housing needs survey, so it is possible that developers will plan to build larger houses to create more revenue. The ANDF emerging housing survey suggests the area needs affordable houses for first time buyers and those suitable for couples downsizing.

Leeds Housing target of 70,000 has been described as "aspirational". Revised Office of National Statistic figures suggest a much lower figure of 44,500 but LCC will not change their target even though Councillor Gruen admitted on television in a 'Made in Leeds' interview that they conceded the figure is nearer 60,000. A lower figure would reduce the amount of Green Belt required to meet the plan.

(3) The Plan is not effective.

It would appear that Leeds and Bradford are not collaborating when planning where housing is planned in terms of roads and traffic congestion. Developments in Menston, Burley-in-Wharfedale and Apperley Bridge will all impact on the A65. Not enough consideration is given to this. There is often a continuous traffic jam from the centre of Guiseley through Menston towards Burley on the A65.

Considerations Specific to Site HG-2-1(3026) include:

- (a) There are 5 official greenbelt purposes.
- (b) To check the unrestricted sprawl of large built-up areas
- (c) To prevent neighbouring towns from merging into one another
- (d) To assist in safeguarding the countryside from encroachment
- (e) To preserve the setting and special character of historic towns
- (f) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

This site fulfils 4 out of the 5 purposes. Development here will result in urban sprawl, will result in the two named settlements of Guiseley and Menston merging along Mire Beck, will not safeguard the countryside from encroachment and by not using this site for housing will mean that Brownfield sites within Leeds will be regenerated by developers as the easily prepared Green Belt will not be available.

The site is in active economic use, is Grade3 agricultural land and there is a well trodden footpath through the area. Hence there will be loss of valuable agricultural land.

Mire Beck is susceptible to overflowing into the fields on a regular basis causing flooding. The site is identified in the Leeds Habitat Network and is home to diverse fauna. 19 trees have tree preservation orders and there are mature hedgerows. The trees are defined in the TPOs as adding to landscape value and a feature of intrinsic beauty.

The Ings defines Guiseley as a settlement separate from Menston, Mire Beck forming a boundary. Development would merge the two, contrary to Green Belt purpose. The fields form a Green Belt Buffer between Guiseley and Menston. It was a Special Landscape Area in the 2006 UDP but seems to have lost its status.

The local infrastructure is not sufficient to cater for a major new residential development, particularly given the current A65 congestion issues. Aireborough has already taken its fair share of development from 2000, resulting in almost all of its Brownfield sites being developed as factories have closed (for example in Guiseley alone the former Compton's lightbulb factory, Silver Cross pram factory, Greenwood's menwear factory, Yorkshire Electric site and others), leaving little local employment.

There have been instances of sewage pollution in Mire Beck due to the poor state of the sewers in the area. Yorkshire Water have still not solved the problem and have admitted that the present state of the sewer network is struggling to cope. If 298 houses are built on the fields HG1-2 and a

further 114 or the other side of the railway on PAS land HG3-1 making 412, that is just short of the major development on High Royds which is close by.

The Plan is not Legally Compliant.

(4) LCC have not fulfilled their duty of Community Involvement.

LCCs document of community involvement was written in 2007. It is out of date and does not include their duty to collaborate with forums and parish and town councils designated to draw up neighbourhood plans. Many feel they have not been consulted fully in the whole site allocation process.

I was informed of the 8 week consultation period and the fact that LCC were holding a drop-in meeting in Guiseley not by LCC but from a leaflet from a voluntary group delivered to my home. No genuine attempt has been made to engage with the community or to help them understand what is being proposed or how to respond to the consultation.

There was one advert in Aireborough on a phone box in Guiseley which was taken down three weeks into the consultation. Nowhere do any documents state that 90% of Aireborough's sites are on Green Belt. Documents refer to Green Belt as Greenfield which is misleading and suggests that land has already lost its Green Belt status. A fully comprehensive Green Belt review has not been carried out as specified by the inspector at the Core Strategy hearing.

(5) LCC have not fulfilled their Duty to Cooperate.

In their background paper of September 2015, one meeting is recorded with City of Bradford Council on 6th March. I doubt that one meeting could have covered all the points on which they should cooperate. Minutes for this meeting have been requested but are not forthcoming.

In the Leeds Local Plan, a comprehensive review of Green Belt should have taken place alongside Bradford. Many of Aireborough's sites have boundaries with Bradford. Aireborough is a fringe area. There is no evidence this has taken place.

In the following section I outline how LCC can make the plan sound:

- Reduce the Leeds housing target from 70,000 to 44,000
- Abide by the National Planning Policy Framework
- Start the Plan again with a better methodology e.g. Brownfield first policy.
- Build closer to areas with better infrastructure
- Build closer to where the bulk of the jobs are, e.g. Central Leeds
- Carry out a comprehensive Green Belt review
- Genuinely engage with local communities
- ~~Cooperate fully with Bradford City Council.~~

I would like an acknowledgement of my response and to be informed of the submission of the plan for public examination and/or the adoption.

Yours faithfully,

D. E. Heard