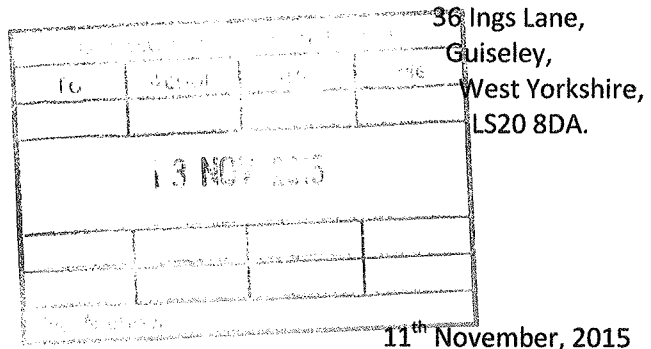


PDH01218

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



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 say I strongly disagree with this site being used for housing. I do not consider the Leeds Site Allocation Plan to be sound for the following reasons:

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. How will the loss of the Green Belt sites reviewed impact upon neighbouring Green Belt areas? LCC have not involved communities in the drawing up of their plans.

LCC's sustainability appraisal has not researched how each site will impact on the existing 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

The Plan is not positively prepared.

There are not enough facilities to cope with the number of houses proposed in Aireborough. Traffic is often queuing from Morton Terrace all along the A65 to JCT 600 in Rawdon, and then can be slow anytime during the day all of the way into Leeds City Centre. Traffic through Shipley coming from any direction is also very congested. The same is true driving in the opposite direction through Ilkley. In Guiseley the traffic is on routes frequented by children walking to school who are being exposed to elevated levels of air pollution from the exhausts of idling cars. No real assessment has been done on the access to each site or the extra traffic it will create.

Other services such as doctors and dentists are hard to access. I have been unable to get an appointment with my own doctor when I have tried over the last couple of years and I now go to a 'drop in' service where there is a strict 10 minute limit on the time and I see a different doctor each time, this service is in Yeadon, leading to another car journey. Our NHS Dentist went private a few years ago, and owing to the great difficulty in finding another dentist, we had to go private. The infant school on Oxford Road has put two new temporary-looking classrooms onto land which was their playground suggesting an increase in the numbers of young children would be difficult to cope with.

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.

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

It is not clear how LCC have arrived at the Leeds Housing target of 70,000. Obviously a lower figure, which may be just as, or even more valid, would reduce the amount of Green Belt required to meet the plan.

The Plan is not effective.

It would appear that Leeds and Bradford are not collaborating when planning new housing in terms of roads and traffic congestion. Developments in Menston, Burley-in-Wharfedale, Kirkstall 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 and in the opposite direction towards Leeds as mentioned above.

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

There are 5 official greenbelt purposes.

- (1) To check the unrestricted sprawl of large built-up areas
- (2) To prevent neighbouring towns from merging into one another
- (3) To assist in safeguarding the countryside from encroachment
- (4) To preserve the setting and special character of historic towns
- (5) 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.

This site is the only undeveloped route left linking The Chevin in the East to Hawksworth Moor in the West and as such is a valuable wildlife corridor which could not be replaced. There are existing mature trees and hedgerows and the site is identified in the Leeds Habitat Network.

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 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. Since 2000 nearly all of the Brownfield sites in Guiseley have been or are being developed (e.g. Greenwoods Menswear Company, Compton's Lightbulb factory, Silver Cross Pram factory, Yorkshire Electric site and others), leaving little local

employment. Many of these developments were not even planned for in the relevant UDP and so Aireborough has already taken more than its fair share of development from 2000.

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 on 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.

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 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.

LCC have not fulfilled their Duty to Cooperate.

In their background paper of September 2015, one meeting is recorded with City of Bradford Council. This does not seem to be an adequate level of cooperation.

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
- 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,

A.C. Heard