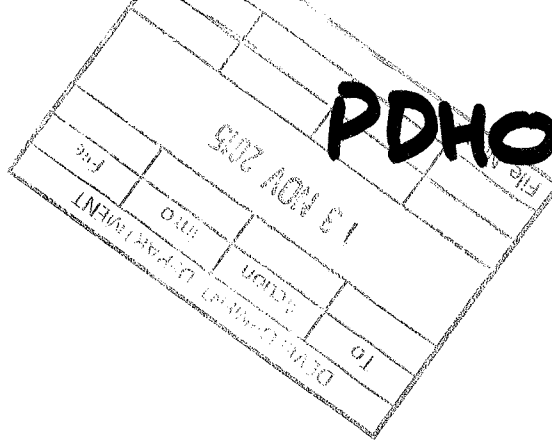


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## **Response to LDF Publication Draft Consultation Leeds Site Allocation Plan**

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

**I disagree with this site being used for housing and I do not consider the Leeds Site Allocation Plan to be sound.**

#### **The Plan is not justified:**

- Where is the comprehensive Green Belt review as requested by the inspector of the Core Strategy? This means a review of ALL green belt sites not just those people want to build on. There may be some green belt sites around the city that are suitable for building on but as they are not the most attractive to builders they haven't been put forward and so not reviewed.
- Local communities have not been involved in drawing up the plans. We are aware that local people need housing and most people are not against appropriate numbers of housing in appropriate places but without adequate consultation this cannot be established.
- The most important thing is not if a site can take a certain number of houses but how those houses will impact on current communities and how the new residents will access services. A full sustainability appraisal needs to be done for each site to show how this would work. Most of the sites in the Aireborough locality would show up as unsustainable as the transport routes, local schools, doctors and other facilities are already over capacity. This needs to be sorted out before the problem is made even worse.

#### **The Plan is not positively prepared:**

- Leeds Housing target of 70,000 has been shown to be incorrect and based on wrong data and forecasts. Despite the Office of National Statistics giving a revised figure of 44,500 Leeds City Council refuses to admit it is wrong. Therefore the whole plan has been drawn up from an incorrect starting point and needs to be re-evaluated.
- Leeds City Council has not carried out a Housing Needs Survey to identify the types of houses needed by local people. We have had a lot of building in the area over the past 10 years, mainly focused on larger family homes as those are the ones that attract a premium for builders. Whilst some of these homes are needed the area also needs homes for single people, older people and live work units.
- For each site Leeds has assessed its proximity to services but what they need to assess is the capacity of those services. Local residents already

have problems with overcrowded schools, doctors, and the A65 is already congested with commuters, residents and those on their way to the National Parks.

**The Plan is not effective:**

- It is not just the Leeds sites that impact on the Leeds area and residents but those that have been developed by Bradford at Menston, Burley and Apperley Bridge. More consideration needs to be taken of this in the plan.

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

This site was allocated as Green Belt as it:

1. Keeps in check urban sprawl by providing a barrier to development.
2. Prevents neighbouring towns from merging into one another. Despite some views to the contrary this area is the only thing that stops Guiseley and Menston merging as the boundary is historically drawn along Mire Beck.
3. It safeguards the countryside from encroachment and the land is currently in active economic use as Grade 3 agricultural land.
4. It will assist in urban regeneration by encouraging the use of brownfield sites. Most of the brownfield sites in Aireborough have already been developed and so the developers have moved on to the Green Belt sites, but there are still plenty of other brownfield sites across Leeds and developers need to be made to realise these need to be developed first.

Other specific reasons that this site should not be developed include:

1. There will be the loss of valuable agricultural land in an area historically tied to farming.
2. Mire Beck is susceptible to overflowing on a regular basis and building on the land would exacerbate any problems here.
3. The site is home to diverse flora and fauna and Leeds City Council need to carry out a survey to identify these.
4. There are 19 trees with Tree Protection Orders and mature hedgerows on the site, which have already been identified as adding value to the landscape of the area.
5. It was a Special Landscape Area in the 2006 UDP but is no longer considered this. As far as I am aware nothing has changed so why was this amended?
6. The plan is for 285 houses to be built on the site, with an option of 114 on the other side of the railway on land that has now been delegated PAS land (HG3-1). This is an enormous number of houses that the area cannot sustain in terms of services. The local doctors, whilst taking on new patients, are fully booked and it is impossible to get an appointment without going and waiting early in the morning. The dentists are all full, unless you go private. Despite living here four years my family and I still have to travel back to my old dentist as I can't get one here.
7. The primary schools are already being expanded to capacity in the area to take the pupils from the 300 houses that have already been built in the last few years. Where are all the new pupils going to go and what about

the knock on effect for the high schools that as yet haven't been part of the plans.

8. The A65 is already overcrowded, as admitted by Councillor Richard Lewis on BBC Look North. I try not to use the car if possible as the roads are so congested it makes driving a problem. All the cars also need somewhere to park and often streets are clogged up with residents and commuter's cars, which makes driving even harder. The last thing we need is more cars. This is mentioned in the plan and apparently the development will be required to contribute to measures to alleviate impact, such as improvements towards Horsforth roundabout. Apart from the fact this work has already been done I don't see how this would help traffic in Guiseley. There are no measures that would alleviate impact sufficiently, other than not to go ahead with the building of the houses.
9. Ings Lane especially is not suited to any more traffic than it currently has as it is a narrow, winding lane that is often reduced to a single lane as not all the houses on it have drives. It is quite dangerous the speed some drivers come down it and more traffic would make for an accident black spot.
10. The site currently does allow for some respite from the traffic however due to the well used footpath across it. By getting rid of it it would mean another journey on foot down the increasingly polluted A65, or through a housing estate, for school children from St Mary's.
11. Finally one of the major benefits the new residents would perceive, and I'm sure would be promoted, is the site's proximity to Guiseley Railway Station. However in rush hour the trains are already overcrowded and more people are simply going to be left on the platform. Local buses are as bad and are only going to get caught up in the increase in traffic as there are no bus lanes here, and no room to put them.

### **The Plan is not legally compliant**

LCC have not involved the community appropriately:

- It has been down to local groups to publicise consultations when they took place.
- Despite attending the **one** consultation event in Guiseley it was so busy I was unable to talk to anyone from the council and after waiting half an hour went home.
- LCC's document of Community Involvement was written in 2007, before the change in government and move to Neighbourhood Plans. It therefore does not sufficiently reflect the current make up of local community structures and give heed to appropriately include them in the consultation.
- With an MA in Local & Regional Regeneration I should be well qualified to respond appropriately to any community consultation done by Leeds City Council, but unfortunately they have made it unnecessarily complicated and almost incomprehensible. It is only thanks to the wonderful Aireborough Neighbourhood Forum, and the other groups doing similar things around Leeds, that I feel people have been able to take part in this consultation.

- The plan is also incorrect in frequently referring to Green Belt as Greenfield and so not giving it its correct title and it doesn't point out that 90% of Aireborough's sites are on Green Belt.

LCC have not fulfilled their Duty to Co-operate:

- Given over 50% of Aireborough's boundary abuts Bradford, and the large number of houses that are being built/proposed there, it would be reasonable to think under the Duty to Co-operate Leeds would have discussed their plans at length with Bradford. Unfortunately there is only evidence of one meeting taking place, the minutes of which are not in the public arena.

How can LCC make the plan sound?

1. Accept their projected figures for the number of houses needed are no longer correct and revise them to those calculated by the ONS of 44,000.
2. Abide by the National Planning Policy Framework
3. Implement a brownfield first strategy for the whole of the city.
4. Undertake a thorough Green Belt review for all Green Belt.
5. Conduct an infrastructure review for all sites before allocation.
6. Look at the employment across Leeds and try and build houses closer to where people work. This has long been shown to be the most sustainable way of living.
7. Carry out genuine community engagement, using the groups that are already in existence. Working with them to engage the wider population, rather than against them. We understand budgets are tight and are willing to help.
8. Accept that the plan took too long to develop and that it needs revising to take account of current trends.

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

Signed,

Mrs Nicola Denson