

PDH01615

RESPONSE LETTER TO THE LEEDS SITE ALLOCATION PLAN.

From Mr Philip J Kirkpatrick

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I comment on the Leeds Site Allocation Plan.
Specific site HG2-1 (3026).

Prior to a submission following the response form issued by Leeds I comment on the general procedures of the Leeds planning.

In 2013 Leeds issued a consultation on their site allocation plan. On issue it was the first that the majority of the Aireborough population had heard of the initiative. The information supplied at the time was minimal, not straight forward and was presented in a way hard to follow and answer. It appeared to be designed to deter the man in the street from response. Only by notable effort from local groups who care about Aireborough were explanations made, and concerned residents able to provide a reasoned response.

Now again this lack of communication and information applies to the recent site allocation plan and response form. There was minimal notification and publicity. Assuming you were even aware that the form existed, it was provided online, in a way that you wouldn't find unless you were actively looking for it.

Once located we were informed that information was available at a library or drop in sessions. The drop in sessions were poorly advertised and the information in the library was not readily visible and had to be asked for. You need complicated involved information to respond to this form as you request with no help provided. The Guiseley drop in session with the planning council was only one day after the consultation began, on a plan the majority were unaware of. The library had less than a dozen response forms at this time.

Due again to local groups people were informed and as a result the said meeting was swamped with concerned residents looking for information and clarity, The Leeds Personnel present could not cope, could not justify their proposals and provided no clarity.

We were given the impression that the response had to be on line on the form. Supporting information was also on line. Certain members of the community felt they had been left out of the consultation as they do not own or know how to use a computer or don't have the computer skills to complete such a form.

I, like many others have reasonable computer skills but like many others I have spoken to, have found the form difficult to use and not user friendly. Later we discovered that letters and emails were acceptable, however it gave the impression that the council were putting people off from making a response by making it too difficult. This is hardly following Government policy on community involvement and discussion.

RESPONSE TO THE PLAN.

Leeds Site Allocation Plan.

Specific reference HG2-1 (3026). New Birks Farm, Ings Lane Guiseley.

I strongly disagree with the proposed use of the site. Also the detrimental effect it will have on the Guiseley area.

Site location.

The Ings lane site is scheduled for around 300 houses, plus a further 100 on an immediately adjacent site recently taken from green belt and placed into PAS land, (with out community discussion,) The number of house proposed appears to vary depending on what document you read. It is not clear.

The site is Green belt and divides the settlements of Guiseley and Menston, this ancient boundary follows the route of Mire beck which has been a clear divide for generations. One of the five purposes of Green Belt is to prevent settlements merging. From observation of the survey map, Google Earth and a physical view from Netherfield road it can be seen that the site is an open agricultural area forming a very clear divide between the two communities. It forms a perfect GREEN BELT. Comments by the council that development is infill do not have any credibility. Come and look. I will give you a guided tour.

Conservation / Ecology.

The site was designated as a special landscape area in 2006 by the UDP this seems to have been forgotten. The site is part of the South Pennines natural characteristic area which is planning to be made The South Pennine National Park.

The site not only divides communities but provides a green way between the hills of the Oda and the Chevin both well known Yorkshire land marks.

The site is identified in the Leeds Habitat network as having a diverse fauna; it has numerous old trees with preservation orders. These trees are described as adding to the landscape and being features of intrinsic beauty.

The fields contain a foot path and designated as grade 3 agricultural land. Once built on it is lost for ever.

The area is known as The Ings an old Norse word for water meadow. It contains a stream forming a boundary as previously mentioned and is poorly drained and subject to surface water flooding which I will discuss in detail later.

The stream and fields form a corridor between open areas and the wild life seen here is notable.

Deer, Fox, Hedgehogs, Rabbits, Hares, Squirrels, Water voles, Water rats, Mice are all seen regularly.

Birds, feed on the area particularly in wet conditions when parts of the site are flooded, there are numerous common birds with others of particular note being,, Heron, Curlews, Owls not often seen but heard most nights, Red Kite, other smaller birds of prey, Woodpecker and Kingfisher. Ducks and Geese regularly swim in the fields.

The stream its self contains fish not as many as previously due to the poor state of the sewerage system that regularly overflows in to the waterway. White Clawed Crayfish, indigenous to Britain are also present.

LCC's plan to develop will destroy all of this; this is a special area not just a couple of fields we need to preserve our heritage and local country side for future generations.

Flooding.

The Ings is a water meadow; by definition it is low lying and subject to flooding. It is soft and wet for much of the year and is an area of natural drainage. Mire beck which runs through the site drains a large area to the East. On numerous occasions during the year the beck tops its banks and fortunately due to ground levels the waters enter the fields as opposed to the adjacent houses that are raised slightly although parts of gardens are effected.

On two or three occasions during the year the flood waters cover most of the lower field, (not surprising as this is a flood plain). On these occasions a second stream forms around 60 m from the main beck flowing across the field. This area acts as a natural water containment area; it protects adjacent housing and also regulates flow down stream.

Significant drainage measures will be required if the area is to be developed, to maintain the natural balance and prevent flooding elsewhere. The effect of the waters will be further exacerbated by the areas of hard standing in a new development that will prevent natural drainage and cause peak flow conditions.

Is it not recognised policy to avoid developing flood plains?

Green Belt.

Green belt areas were set up for defined reasons and are still considered important by the national government and apparently by the council and they should only be utilised in exceptional circumstances, after full consideration. Full consideration has not taken place. 95% of the sites put forward by the plan for Aireborough are Green Belt. There is something wrong here. Some areas of green could be considered as marginal however the Ings area is a true Green BELT as described above. It divides

communities, it has a history, it joins open hills across the valley and has varied flora and fauna. There is no justification for a change of use or development and this takes no account of the drastic effect the development will have on the surrounding town as described below.

Of note..

The area immediately east of the Ings site just across the railway was until very recently green belt. It has now been designated as PAS land with no apparent community involvement or discussion. A further example of Leeds council's lack of transparency and communication. People in the area were not aware of this change until it was a fait accompli, This is unacceptable behaviour, developers are already looking at this area for 100 or so houses, access from this and the Ings area are both onto a narrow congested area, where is the planning, consideration and future insight.

Brown field sites are supposed to be developed first; this does not appear to be the case in Leeds. Developers don't like brownfield sites it reduces their profit. The main developers seem to have notable influence and the ear of Leeds council. There are a lot of local building firms who given the opportunity could work with the community building the type of housing needed at much less than the 25% profit reported in the news that the major firms seem to demand.

Brown field should be developed first, and consideration given to communication and understanding on the effects on the community..

Transport.

This is a major issue, Guiseley is already congested as recognised by councillor Richard Lewis on BBC Look North. The main A65 cuts through the town and is very close to the Ings site. The main access to and from the site will be onto this very busy road often with standing traffic.

The congestion has been brought about over recent years by the building in the local area of over 1000 houses, these have been built on every spare piece of ground both green areas and previous areas of employment, so much so that the only areas left not built on are Green Belt making their retention much more important. 350 houses have just been completed 100m away from this site on Netherfield Road with no improvements to any services, facilities, health care, school transport or roads. There are problems now, and Leeds are proposing more houses with no provision for any mitigation of further problems and a further reduction in the current residents' quality of life.

The proposed developments on Ings Lane will potentially add 400 houses to the area all accessing on to Ings lane a small local unclassified road which is narrow, is used for parking by the residents many in terraced housing with no where else to park, and in a number of sections there is not free 2 way movement of traffic. The lane accesses

on to the congested A65 at a difficult junction. Traffic flow has already increased to capacity as the recent building has been completed. Further traffic onto this road is not acceptable to either the residents on the road or the residents of Guiseley that also use it.

At the A65 junction is Guiseley football club. Traffic chaos reigns here when there is a match it may be short lived, but a problem and it will clearly be significantly worse if further housing is allowed. There are no plans for any improvement, in fact improvement would be very difficult as the area is just over capacity and over developed. Residents who have recently moved into the housing on Netherfield Road are now stating they wished they hadn't due to the overall congestion and lack of facilities for their families.

Local Services.

In brief Schools are over capacity with local children having difficulty finding places both Junior and Senior schools. Attempts are being made to increase capacity by building extensions and siting temporary classrooms as crisis management, but it is not enough. What a poor message to send to our children. It is not coping now and Leeds wants to make it worse. Unacceptable.

The same shortage applies to Doctors, Dentists, Transport, Parking, Leisure and general services these will all be exacerbated. We see no plans to relieve any of this. We are told the developers will contribute to improvements this hasn't happened to date in Aireborough and when questioned on this the council stated that monies from these schemes would be used to improve the Horsforth ring road traffic island. This doesn't help Guiseley and the work has already been done. Don't they know what they are talking about? It is an insult to our intelligence.

All potential employment sites have been turned into housing in recent years meaning residents have to travel travel with difficulty to their place of work. In 2007 the area was described by the council as over developed and now it is significantly worse.

People in surrounding areas try to avoid the area it is well recognised as over developed. Housing needs to be where the work is. Planning for the future should be the priority, not attempts at short term fixes that exacerbate things in years to come.

2.2.b

Most of the above comments mainly on the wider effects on Aireborough and the lack of services and transport problems/ congestion apply to the area as a whole, the other main areas put forward in the plan are all Green Belt and have similar concerns.

Guiseley in particular has had more houses built in recent year than it can cope with. This is clearly apparent. The Lees authority needs to look elsewhere and review their whole strategy and housing numbers.

2.c

An area which was allocated for housing in the 2013 SAP and now dismissed was site 2038 Low Mills Guiseley for 144 units. Was this removed because there was not enough profit in it for the developer and some infrastructure would have to be

addressed in the way of access?

2,d.

An alternative to the Ings may be to look at the High Royds area. There is notable unused space here now the promises of a Village location with a school, businesses, shops, has not been fulfilled. The authorities have let the developers out of all these commitments so they may as well build on the unkempt areas that are now appearing.

PART 3.

3.1.

NO the plan is not sound.

It is apparent that Leeds thought they could push through their ideas with out communication with the local areas and not follow planning procedures.

3.2/3,3

Leeds plan has been prepared with little or no communication, discussion and involvement with the specific areas contrary to government guide lines. There is no overall assessment of the effects on the Aireborough area of the plan and no study on the effects of the 1000 houses built in the area recently, all the residents travellers and visitors are fully aware of the congestion and lack of services to accommodate these with out adding more.

Leeds have prepared a plan fundamentally flawed based on a housing target of 70,000 This is based on poor out of date information from a non typical period. Other bodies have assessed the figure as lower, and more importantly the office of National Statistics has calculated a figure of around 44,000 homes.

Leeds councillor Gruen actually admitted on television that the figure may be too high but also stated Leeds were not going to reassess. I have been told that Government monies are available based on the housing numbers, I find this interesting.

A lower figure could greatly reduce the need to utilise Green Belt. Leeds has reportedly space for about 35,000 homes that could be built if the identified Brown field areas were utilised. Brown field is supposed to be prioritised this clearly isn't happening. The Council appears to give way to the developers who don't want to build on brown field sites due to the increased work and reduced profits. They obviously prefer a nice green field, This should be addressed.

There are not enough facilities to cope with the current increase in housing in Aireborough that has occurred over the last few years of over 1000 houses. There has been no changes, little improvement and again, with the new plan, these issues are not fully addressed, nothing is fully assessed there is no positive planning. No new health centre has been built in Aireborough since 2005, Schools, traffic, transport, local employment, and services such as sewers and drains are all under stress.

No full assessment has been undertaken with regard to site access. All the allocations in Guiseley access onto roads that are congested now before the developments and these roads exit onto the A65 which is already recognised as a problem as stated by the council on 2 occasions on the television. The rail links to Leeds and Bradford should be good but at key times the trains are full with standing room only if you can get on the train. It isn't coping now before the effects of the plan. Parking for the station in Guiseley and Menston is extremely problematical. Leeds planning has allowed housing on many local industrial/employment sites so people have no option but to either leave the area or cope with the very difficult travelling.

A detailed housing needs survey has not been done for the area. Developments for the last few years have paid little attention to the number of affordable houses keeping these to a low number. In general housing has been larger houses (better for the developers) Local groups have identified the need for affordable housing, first time buyers, and down sizing for older residents. This allows the community to progress. Guiseley in particular is at capacity having accommodated 1000 homes in recent years. The only land left is Green Belt. This should be protected and wouldn't be needed at all if the housing numbers identified as necessary by independent bodies are correct and utilised, Leeds need to do this assessment again correctly.

The plan is not positively prepared.

3.2. Justified.

The land for development in Aireborough is 95% Green Belt. The core strategy states that a full comprehensive Green Belt review should have been undertaken at commencement of the plan, it was not done. This was identified as a short coming by the previous inspector but no action was taken, this is a major failing of the plan a full review would have identified all the issues raised here and by the community as a whole who are all in general agreement that enough is enough, in fact too much.

Green belts were set up for specific purposes.

1. to prevent sprawl
2. to prevent merging of communities and towns
3. to safe guard the country side
4. to assist in maintaining an areas character
5. to focus monies into development of derelict and brown field sites as opposed to going for the easy option.

These criteria all apply to the Ings Lane site and all have been ignored.

This can not be justified, neither can 95% of Aireborough sites being Green Belt be justified

There is a requirement to involve and communicate with the community. Leeds certainly did not do this in preparing the plan. They have been very reticent at all stages to share and provide information to the public. If it hadn't been for local concerned groups trying to protect the area from further problems and keep the area fit to live in the majority of residents wouldn't even know of the plan and certainly wouldn't understand it. The form for response to the plan appears to be deliberately

prepared to make a response difficult. This is identified by 100s of residents at local ANDF pop up sessions all wanting help to respond.

There are no transport surveys for the sites, no assessment as to how the plan will affect residents, no assessment of what additional services will be required and at what cost. For the green belt areas no detailed ecological report. No local input or account taken of the specific Aireborough sites and the current conditions.

The whole Aireborough area is under stress, under resourced and congested making travel, shopping, health care, schooling serious areas of concern. People from surrounding town now try to avoid the area due to the delays experienced.

3.2/3 Effective.

The plan has an aim to construct 70,000 houses in the Leeds area as stated previously there is considerable evidence that this figure is flawed and the plan should be based on 44,000 houses. This is fundamental, how can the plan have any credibility or be effective? How can attempts be made to improve facilities, transport, roads etc to keep up with demand when the demand is in question? The answer seems to be no assessments on the effects have been considered in detail so it can not be an effective plan.

There is no apparent communication between Leeds and Bradford only 1 meeting is said to have taken place. Both councils propose major developments in the area that affect both communities and the congested A65 which is regularly at a stand still in Guiseley. Bradford have plans for 2 major developments with around 700 houses they will all affect the main A65.

Travelling is very slow and getting worse it is the major issue for all residents, many people who have moved to the area are regretting it. To travel from White Cross to the retail park 1.6 miles can regularly take 20 minutes, stop start through 5 sets of traffic lights, this is the main A65 a key route into Leeds.

Otley and other towns are planning developments and all share facilities and roads there is no joined up thinking and planning even though this is being pushed by the government. The plan is poorly thought out as are many of the proposed developments and in the Aireborough area it will make a difficult situation much worse.

3.4 To make the plan effective.

1. Go back to the beginning and independently assess the housing numbers 70,000 Or 44,000?
2. Look at the areas in detail and the effects development will have.

3. Look at what can be done to maintain the communities and provide the resources needed before the developments are complete not after when it is too late and past experience shows nothing is done.
4. Communicate in depth with the people and local groups in straight forward English which we can all understand. Understand the local issues.
5. Get to grip with the developers insist on brown field first and ensure they build the type of housing the areas need.
6. Have a positive and effective transport plan to ensure congestion is reduced not increased.
7. Build housing where there is employment to reduce transport issues, or build employment where there are people to reduce commuting, office staff can work in an office anywhere it doesn't have to be in the city centres, look to the future not just the next few years.
8. Make every effort to protect the Green Belt areas. Once built on they are gone forever. The environmental advantages and ecology they foster is to every ones advantage.
9. Abide by the NPP framework.
10. Carry out a full Green Belt review as should have been done.
11. Discus proposals and plans with neighbouring councils to allow some integrated planning.

4.1 Legally compliant.

No. The plan is not legally compliant.

Leeds has not followed their duties to communicate and collaborate, particularly with forums and local councils who should have been involved in drawing up the plan.

Leeds have not made any significant attempt to inform the public of the plan. The Guiseley drop in session was only one day into the consultation after the details of the response were released, expecting people to be conversant with a complicated document. The say made available where? Libraries were not advertising the fact they had copies of all the relevant and complicated documents and only a limited number of response forms.

If it hadn't been for local concerned groups the majority of the population would have been totally unaware of matters that significantly effect there future.

There is no clear reference to the Aireborough sites being 95% Green Belt in fact it is misleading calling them Green field areas.

Leeds did not carry out a comprehensive Green Belt review as was there duty as required by the core strategy.

I have no evidence of detailed consultation with the service providers/statutory bodies there are problems here which will be exacerbated by further development and no plans to deal with this major factor.

There has been little communication and discussion with adjacent authorities no allowance or consideration has been made for this, plans will interact there is a duty to have joined up thinking.

Part 5

I would like to be present at the inspectors hearing and acknowledgement of this letter.

Please inform me of the date of submission of the plan for public examination and the subsequent results.

Signed Philip J Kirkpatrick BSC. Chartered member of IG.

DEVELOPMENT DEPARTMENT			
To	Action	Info	File
16 NOV 2015			
File Number			