

# PD1401617

LDF Publication Draft Consultation  
Forward Planning and Implementation  
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Leeds LS2 8HD

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## **This is my response to the LDF Publication Draft Consultation Leeds Site Allocation Plan Section HG-2-1 (3026) New Birks Farm Ings Lane Guiseley.**

To whom it may concern,

Firstly I would like to express my concern over the form which you have designed for this consultation. Many people I have spoken to have found it daunting and have begun to fill it in only to find that the whole thing has crashed and they have lost their work. Some have tried to fill in the form at the weekend when they have found that your site is down for essential maintenance.

I have therefore decided to write my response as an email.

I do not agree with site **HG-2-1 (3026) New Birks Farm Ings Lane Guiseley** being used for housing.

### **I do not consider the Leeds Site Allocation Plan to be sound.**

#### **The plan is not justified**

1. Leeds City Council has 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; therefore this GreenBelt review is selective, not comprehensive.
2. In the October 2014 updates to the NPPF, revision ref ID: - 3-034-20141006 methodology stage 5: final evidence base. "In decision taking, can unmet housing outweigh Green Belt protection?" "Unmet housing need (including traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the very special circumstances justifying in approving development on a site within the Green Belt"
3. In terms of community involvement, ordinary people, although Leeds say they are consulting with them, would not have known about this public consultation if it were not for the local voluntary groups. One advert for the whole consultation in Aireborough posted on a phone box off the beaten track in Guiseley does not seem sufficient advertising of the fact. The documents are available in the Libraries, but again, not advertised and hidden on shelves. Even now there are people in Aireborough who are completely oblivious to this consultation.
4. The sustainability appraisals for the sites preferred for housing do not take into account how these sites will impact on the community and how the new residents will access amenities. There are no transport reviews or ecology reports. They contain mistakes due to lack of research and local knowledge. There is no plan for future infrastructure and no taking into account the cumulative effect of all the allocations in the area on the infrastructure not to mention those of the bordering allocations from Bradford which will greatly impact on our infrastructure.

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

1. Guiseley, in a 2007 report by LCC reported that even then it was over developed! With the numerous houses that have been built since then this must put a strain on the facilities. Very little infrastructure has been put in place to service these houses apart from traffic management in the form of traffic lights. There are not enough facilities to cope with the number of houses proposed in Aireborough.
2. The A65 is congested. Ask any resident of Aireborough what concerns them most about further houses being built and they will tell you it's the A65. Already traffic crawls through Guiseley, through to the JCT roundabout and not only at peak times. The Westside Retail Park has added to that congestion considerably, especially at weekends. The road has queued traffic travelling towards the Dales at weekends in the mornings at weekends and in reverse in the late afternoon. We have been repeatedly told that the A65 is not congested by Leeds officials but recently Councillor Richard Lewis admitted this on BBC "Look North" interview.
3. No real assessment has been done on the access to each site or the extra traffic it will create.
4. Although 1300 houses have been built in Aireborough between 2000 and 2013, there have been no new health centres since 2005.
5. Although some Primary Schools in Guiseley have expanded for this academic year, I do not know of any plans for the same to happen to the two main secondary schools in the area, which are in poor repair with leaking roofs and shabby interiors
6. 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.
7. It is likely that potential developers will want to build 3-4 bedroom houses on the sites allocated as these bring higher prices. Leeds have not done a housing needs survey. An emerging housing survey instigated by the ANDF suggests the area needs affordable houses for first time buyers and those suitable for couples downsizing.
8. 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.

### **The Plan is not effective**

It would appear that Leeds and Bradford are not collaborating when planning where housing is to go in terms of roads and traffic congestion. Developments in Menston, Burley and Apperley Bridge will all impact on the A65. Not enough consideration is given to this. Nor have they collaborated over the impact on their shared green belt buffers.

### **Site Specific Information**

1. Leeds do not score regeneration purpose on their green belt assessments, so each site is devalued by 1 green belt purpose by not including this. Calderdale, for example counts this purpose as 1 point.
2. This site fulfils 4 out of the five purposes of Green Belt.

3. Development here will result in urban sprawl.
4. It will also result in the two named settlements of Guiseley and Menston merging along Mire Beck. It has not been taken into account that Moorland Crescent is and always has been part of the village of Menston along with the High Royds development. The major urban settlement border has been drawn around it forming a finger which makes the Ings fields look like infill when they are in fact performing the Green Belt purpose of preventing settlements merging.
5. Not developing this site will safeguard the countryside from encroachment and will mean that Brownfield sites within Leeds will be regenerated by developers as the easily prepared sites on Green Belt will not be available.
6. The site is in active economic use as farmland, identified as grade 3 agricultural land on the Magic database. Beef Cattle are currently grazing there, but it has in the past been used to raise sheep and grow silage and hay.
7. There is a well trodden footpath through the area. ( Aireborough 36)
8. There will be loss of valuable agricultural land. Given a recent study by Cambridge University there will be a shortfall of 3,000,000 hectares of agricultural land by 2030.
9. Mire Beck is susceptible to overflowing into the fields on a regular basis causing surface water flooding and entering the gardens on Moorland Crescent. The water table is close to the beck level, the fields acting as a natural soak away from the surrounding high ground. Building over these fields will increase the drainage speed during heavy rainfall prejudicing the properties on Moorland Crescent.
10. A 30% increase in rainfall up to 2086 must be taken into account when considering drainage and surface water flooding.
11. Leeds Habitat Network has included the Ings as it is home to diverse fauna.
12. There are 19 trees with 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".
13. The Ings defines Guiseley as a settlement separate from Menston, Mire Beck forming the boundary. Development would merge the two, contrary to Green Belt purpose.
14. The fields form a Green Belt Buffer between Guiseley and Menston.
15. It was a Special Landscape Area in the 2006 UDP but seems to have lost its status although the landscape has not changed.
16. The local infrastructure is not sufficient to cater for a major new residential development, particularly given the current A65 congestion issues, surely major house building on this scale should be plan led not crisis managed? It would make sense to build communities by providing them with cultural, social and economic infrastructure rather than destroying them by further reducing their quality of life?
17. 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, leaving little local employment. No plans have been made for local employment except for an innovation park at the airport, which was added at the last minute when the planners realised the deficit.
18. There have been instances of sewage pollution in Mire Beck due to the poor state of the sewers in the area. YW have still not solved the problem and have admitted that the present state of the sewer network is struggling to cope.

19. If 285 houses are built on the fields HG1-2 and a further 114 on the other side of the railway on PAS land HG3-1 that makes 399. Add to that the 300 or so that have recently been built on Netherfield Road and the 400 or so on High Royds, (all in Guiseley) and all within less than a square mile, all using the same creaking infrastructure, exacerbating an already congested area and destroying the community is it any wonder the existing residents are infuriated when their quality of life is being reduced?

## **The plan is not legally compliant.**

### **LCC have not fulfilled their duty of Community involvement.**

1. LCC's statement document of community involvement was written in 2007, before Neighbourhood Forums were brought into being. It is therefore out of date and does not include their duty to collaborate with forums and parish and town councils designated to draw up neighbourhood plans.
2. Many feel they have not been consulted fully in the whole site allocation process.
3. In terms of letting the residents of Leeds know about their public consultation, in fact it has been anything but public. I found out about the 8 week consultation period and the fact that LCC were holding a drop in meeting in Guiseley from a leaflet from a local group.
4. 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.
5. There was one advert in Aireborough on a phone box in Guiseley which was taken down three weeks into the consultation!
6. No where do any documents state that 90% of Aireborough's sites are on Green Belt.
7. 2015 documents now refer to Green Belt as Greenfield which is misleading and suggests that land has already lost its Green Belt Status. In the 2013 document it was clear which sites were Green Belt and which Greenfield.
8. 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**

1. In their background paper of September 2015, only one meeting is recorded with City of Bradford Council on 6<sup>th</sup> March where fringe allocations may have been discussed along with their cumulative effect on infrastructure, Green Belt and the congestion on the A65. No minutes are evident from this meeting.
2. 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.

## **Suggestions as to how LCC can make the plan sound.**

- Reduce the Leeds housing target from 70,000 to more in line with the 44,000 (ONS data) which would in turn reduce the impact on Green Belt land.
- Abide by the National Planning Policy Framework (NPPF)
- Start the plan again with a better methodology e.g. Brownfield first policy, plan led not crisis managed in terms of infrastructure, thus creating a better community.
- Have an infrastructure plan in place before the site allocations plan.
- Build closer to areas with better infrastructure
- Build closer to where the bulk of the jobs are, e.g. central and SE Leeds.
- Carry out a comprehensive Green Belt review
- Genuinely engage with local communities.
- Cooperate fully with Bradford Council on housing developments and other issues which affect the border areas of the two councils.

**I would like to be present at the inspector's hearing.**

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

Yours faithfully,

Liz Kirkpatrick

13/11/15

1



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