

AIREBOROUGH NEIGHBOURHOOD DEVELOPMENT FORUM

Designing A Thriving Place

Cllr Neil Walshaw
Leeds Development Plans Panel
Sent via email

11 January 2015

Dear Cllr Walshaw

We would like to express the extreme concern of residents in Aireborough about the proposed site allocations there. Also, our great disappointment that, despite the intention of the NPPF that local people should shape the place they live (NPPF 17), responses and evidence from the site allocations issues and options consultation have NOT been listened to: not from local residents, not from the Neighbourhood Forum and Parish Council, not from our Ward Councillors, nor from MP's.

We would like Development Plans Panel members to consider the following points in their deliberations on 13th January; further details are in the body of the letter.

1. **Neighbourhood Development Plans** - Aireborough has been undertaking evidence gathering for the NDP since 2012. Neither that evidence nor the Neighbourhood Forum, have been included in the details of site allocation assessment or choice. Is this in line with the NPPF?
2. **Sustainability** – Leeds City Council has not yet completed full site sustainability or cumulative impact assessments for community wellbeing. Is that in line with the NPPF?
3. **Green Belt** – The NPPF requires exceptional circumstances for Green Belt to be changed or developed. What are these exceptional circumstances for Aireborough? And where is the comprehensive Green Belt review the Inspector called for?
4. **Site Assessment Inaccuracies** – We have a number of examples of these – see below

1. Neighbourhood Planning Evidence And Involvement

The overriding result of the qualitative and quantitative evidence collected by the Aireborough Neighbourhood Forum for the site allocations consultation in the 2012/2013, was that “**Chronic issues with infrastructure must be addressed, as Aireborough has been overdeveloped for its current capacity**” Over 2,000¹ homes have been built or are in the pipeline, in the last 10 years alone, and more over the last 20 years- nearly all on old employment sites.

¹ Full data still to be supplied by Leeds City Council

Our local representatives have said

"Aireborough cannot take anymore houses we have not got the infrastructure for them" (Guiseley and Rawdon Ward Cllrs)

"It is difficult to justify the loss of green sites when there are still a number of brownfield sites available to meet housing need" "we are concerned that the plan has no proposals to deal with the impact on communities and what investment in infrastructure is needed" (Otley and Yeadon Ward Cllrs)

*"Over the past 10 or 20 years, every part of my constituency has been affected by mass **over development** – we have already taken our 'fair share' of new housing. It is totally unacceptable that the Council are looking at our greenbelt for further development when there are areas across the city that could be regenerated and supply much needed housing". (Stuart Andrew MP, Pudsey)*

"I have significant concerns about the impact of the level of housing development proposed in this area which has the potential to make very significant changes to the nature of local communities. We need to see much clearer information about the provision of infrastructure." (Greg Mulholland MP, Leeds North West)

None have seemingly been paid any heed. The report to Development Plans Panel Board gives details of number of consultation responses, but does NOT give details of the evidence the Neighbourhood Forum has produced through consultancy with CABE and a site allocations survey - a survey we had to do with public funds, as Leeds could not afford an exhibition and consultation in Aireborough !! The response of over 700 people has been boiled down to ONE comment in the name of one individual person, NOT the Forum!! The same had happened for Rawdon Parish Council. **This is not a fair or accurate representation of the evidence gathered by bodies especially designed to do Neighbourhood Development Plans.**

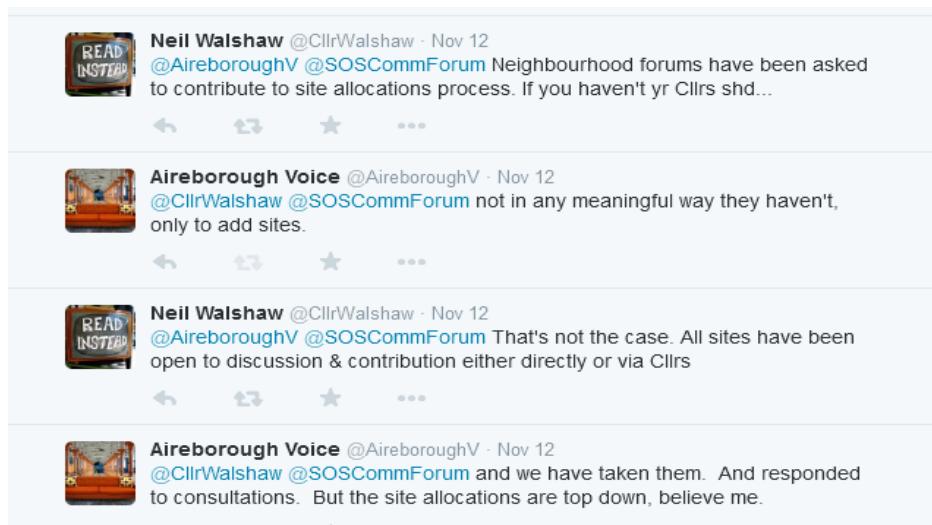
The report also talks of site visits and workshops between June-Dec 2014 (item 3 and 2.3), but NONE have been done with the Neighbourhood Forum(which has to be representative of the whole area), or local people in general. In an email from Lora Hughes, Forward Planning, dated 5 June 2014 regarding infrastructure needs and CIL she said

*"It is the role of the Site Allocations Plan **and particularly neighbourhood planning** to get into the level of detail which you are describing. The last paragraph of the DCLG letter states: "An early discussion with the local authority is important to establish how CIL and other funding sources might be able to assist delivery of the Neighbourhood Development Plan, particularly the plan's policies and infrastructure proposals and thus to be clear on how the neighbourhood development plan proposals will be delivered."*

We replied that *"local communities doing neighbourhood planning work, **are not being involved** proactively as a partner in the detail of the site allocations infrastructure needs. Yet, it seems that it is at the level of neighbourhood planning that Leeds see local needs being examined and met. There is a huge disconnect here between intentions and action !!!Here in Aireborough we have a huge issue already with a lack of infrastructure to meet the needs of past development, let along any new development. Last year we did an area wide survey for the Site Allocations Issues and Options, and received a deluge of mail and comments about the dire state of current infrastructure – if I say people are angry, that is an understatement."*

We were told that this requirement by DCLG to involve us in the site allocation discussions especially for infrastructure and CIL, would be remedied – it hasn't been. In a Twitter exchange with yourself on 12 November 2014, you seemed under the impression that local opinion had played a part in the current

proposals – we told you that was not the case; and so it has proved. You did say you would meet with us, but that has not happened yet.



Neil Walshaw @CllrWalshaw · Nov 12
@AireboroughV @SOSCommForum Neighbourhood forums have been asked to contribute to site allocations process. If you haven't yr Clrs shd...

Aireborough Voice @AireboroughV · Nov 12
@CllrWalshaw @SOSCommForum not in any meaningful way they haven't, only to add sites.

Neil Walshaw @CllrWalshaw · Nov 12
@AireboroughV @SOSCommForum That's not the case. All sites have been open to discussion & contribution either directly or via Clrs

Aireborough Voice @AireboroughV · Nov 12
@CllrWalshaw @SOSCommForum and we have taken them. And responded to consultations. But the site allocations are top down, believe me.

In spite of current over development and sustainability concerns Aireborough's target has been increased from 2,300 to 2,366 – 1,600 of these being new site allocations, the majority in the Green Belt - local people are incredulous and angry.

2. Sustainability

The key concern of the majority of people, is sustainability – and that current proposals are not in any way sustainable. To add to the 2013 consultation response, the reality is that our infrastructure is now breaking down to the detriment of wellbeing.

- There is a crisis in current schools provision as witnessed by the mass protests over Guiseley Infant School in 2013 and the anger at the outcome. The Development Plan report admits that sites for new schools in Guiseley are limited (4.5s) even with the current population !!
- The A65 through Guiseley is not able to take a much needed 20 second delay pedestrian crossing, because Leeds Highways say 'To increase the red light timing on the A65 by 20 seconds to allow a crossing, would cause unacceptable congestion'. Therefore, a one way system is to be put in, causing even more congestion on key pinch points. Yet the Development Panel report tells us that detailed transport modelling has been done (3.19) – on our evidence, we doubt that, and also that it has taken into account ALL recent development?? !!
- There has been exceptionally bad feeling, with people nearly coming to blows, over sensible plans to upgrade the local football club facilities, because of people's worries over parking – this is not a football club issue, but a Guiseley infrastructure issue.

We quote this paragraph from a resident regarding the pedestrian crossing/one way system as an example of how many residents feel about living in what is now a congested suburban dormitory, and we ask if this is what Leeds means by 'the best City', and if this is in line with the NPPF?

"In the 42 years I have lived in Guiseley I have watched it slowly become over-populated and in all honesty a nightmare to get into and out of... there are more and more residential developments in progress so this is only going to get worse... I used to love living there... now it's a means to an end... this is another nail in the coffin that is Guiseley... I think you are deluded if you honestly believe this proposal is going to be an improvement!"

The Aireborough Neighbourhood Forum, along with many others, cannot see how Development Plans Panel can approve any proposals for site allocations, without

- **comprehensive sustainability assessments; which have not been done**
- **detailed cumulative impact assessments; which have not been done**
- **a great deal more input from the evidence being gathered by neighbourhood planning groups, who have not been involved at all, despite that being their purpose. There is no Recommendations of this at item 7 of the Development Plans Panel report.**

3. Green Belt

The coalition Government has categorically stated that Green Belt is not to be changed or developed unless there are exceptional circumstances. Housing targets are NOT exceptional circumstances. We have been told this personally by both Brandon Lewis MP and, before that Nick Boles MP, in their role as planning Ministers, after hearing of our concerns.

In addition, the Leeds LDF Inspector in his report called for a comprehensive Green Belt review, rather than a selective Green Belt review, when he deleted 'selective' from the LDF. His point 29

"as submitted, the Core Strategy only commits the Council to a selective review [of the Green Belt]. This may lead to pressure to release land in the review area when, having regard to the advice in para 85 of the NPPF, there is more suitable land elsewhere. A comprehensive review is also more likely to ensure consistency with the spatial strategy "

We have checked with the Inspector himself (email dated 10 December 2014) that he wants the Council to do a comprehensive Green Belt review.

We cannot therefore see, how a housing target, where 53% is on Green Belt site allocations, and around 60% on green space, is in line with either the Government's NPPF policy or the Inspector's requirement for a comprehensive review. As previously mentioned nearly all the new site allocations for 1,600 houses is on Green Belt, as is the proposed PAS land.

4. Site Details – Inaccuracies

We consider that there are some **fundamental inaccuracies** on a number of our site allocations, concerning both Green Belt purpose and sustainability. This is not a list of all the sites, or all the issues, we have grave concerns about; just examples of what has happened because local people have not been listened to.

Site 3026 Guiseley/Menston Boundary (298 Houses)

To allow for this 298 housing site, Bradford Road, **Menston**, has been included in Guiseley; proposed development is thus in the Green Belt that separates Guiseley from Menston. The Guiseley township boundary is along Mire Beck, and significant development of the area will change forever the old water meadow and Village boundary. This mistake is amplified by response to the recent Guiseley Town Council Review when residents voiced their very strong objection to being part of Guiseley. Thus, Green Belt here clearly fulfils the purpose of preventing neighbouring towns from merging, and checking unrestricted sprawl.

In addition, this site is part of the geographically important Guiseley Gap, and has always given the area its environmental and geographical distinctiveness – it is a ‘heritage’ asset of significance – views across this area are considered key in the Guiseley conservation assessment. In a recent application at the far end of the Gap, planning permission was refused by the Planning Inspector primarily because of the important views of the Guiseley Gap up to the Chevin.

It is an unusual area because it is a glacial valley without a river, but it does have a very high water table prone to flooding, which produces a fairly unique ecology and wildlife habitat, being home to herons, moorhens, and coots. We have already had a geology study done on this area which says *“This area, known as the Ings, [water meadow], is a long established, poorly drained area which takes and absorbs rain and ground water from the surrounding hills, providing naturally regulated entry of water into the adjacent Mire Beck, which itself is prone to flooding. Due to the low lying nature of adjacent fields the stream water, in periods of high rainfall moves onto these fields and as a result greatly reduces and regulates the flow down stream.”*

If building were to be allowed here balancing ponds to stop flooding to houses here and lower down toward the Wharfe would be required, it would also mean work to the railway line and major work to the sewage system which even now overflows. The same discussion can be had for site 4043 which has been identified as PAS land. There must be far more suitable brownfield sites in the Leeds City region than this Green Belt site!!

We do believe there is room for some building on this site around the derelict Birks Farm on Ings Lane. This has been identified as a potential enclave of single person’ properties, which are needed and/or vital services that are required in the area.

Site 1221 Gill Lane, Nether Yeadon (155 houses)

Nether Yeadon is an old and distinctive settlement in its own right historically. It is a **rare survival** of the medieval and early modern landscape of sparsely populated, but interlinked farmsteads, cottages and houses important to the South Pennines area – Aireborough is the only part of Leeds in the historic and ecologically designated South Pennines area. The open spaces, landscape, views and exposed character all contribute to this highly distinctive and unique place.

There is strong support from English Heritage, as well a force of public opinion, for the protection and preservation of this ‘townscape’ which is linked to Mary Queen of Scots and Sir Winston Churchill. It has already suffered from the building of the Westfield Estate post war, and the need to preserve and enhance the major part of this settlement is now crucial. A conservation appraisal is due to start in early February 2015 – **this appraisal should be informing the future of site 1221 for development , NOT the other way around.** Site 1221 is one of the last remaining fields linked to the historic Low Hall; it should remain primarily green, although we do see that a part may be used for medical facilities and green washed. Nether Yeadon’s future is also linked to sites 3033, 1104, 2162, which we are pleased to see are now categorised red, as they also fulfil Green Belt purpose.

Site 3029 Wills Gill, Guiseley (133 houses)

On the original site allocations, this was a red Green Belt site, with the concern that it performed a role in safeguarding the countryside from urban sprawl. Indeed, a site next door 1255A, still does. How is this situation on adjacent sites consistent? What has changed to disallow this site's Green Belt purpose? The Development Panel report states that Leeds have tried to maintain wedges of Green Belt coming into an area – yet here they are destroying exactly that.

We consider that this site still does stop urban sprawl, and preserves the setting of the most historic part of Guiseley. It has been identified in the Neighbourhood Forum's work as one that gives local distinctiveness, and is an heritage asset, as it gives the context for the medieval crofts and tofts behind the houses on Town Street, and is a Treasured area/view. The proposals to build right up to the medieval boundaries in the conservation area, completely destroys their context. The Guiseley Conservation assessment states clearly that the planning process should ensure that the setting for conservation areas is a material consideration. Previous planning applications for this area have been refused.

Further, to this, consideration should be made of traffic with this and adjoining site 1225B (see below) the Queensway/Towngate area, is already under severe pressure, with long tailbacks at certain times of the day. Access to Hayworth Lane from Queensway is heavily congested at peak times as is the access to Queensway from Coppice Wood Avenue. Congestion around Queensway School is a problem due to parked cars and children being dropped off or picked up at the school. All of this is of considerable detriment to wellbeing and quality of life in this residential area much of which has a multiple deprived area index between 6-8, **which is especially high in the living environment**. At point 3.19 Transport Modelling, of the Development Plan's Panel report, it says that 'detailed transport modelling has been undertaken for proposed allocations, quite frankly we sincerely doubt this has been done adequately either for the sites, or for the whole cumulative development of the area.

Sites 1255B Banksfield, Yeadon and 1311A, 1180A, and 2163A, Coach Road, Guiseley

We could carry on with inaccuracies, lack of Green Belt purpose assessment, and sustainability assessments including wellbeing in deprived areas, with many other sites in Aireborough, including the Banksfield and Coach Road sites all of which have serious access and traffic implications which are **just not acceptable**.

Accessibility is mentioned for the Coach Road sites at 4.5s with the consideration of a school there. The Site assessment for 1255B is inaccurate as it states it has road frontage; when it has only a single access point.

There is also a very strong case to make for development on all of these sites being urban sprawl. 1255B is not "rounding off the settlement pattern" but is a straightforward extension of the developed area into the Green Belt ; there is no indication as to what the exceptional circumstances are to allow this. 1255B has sound physical features forming a barrier between the developed land and the site in the form of a stone wall and hedge/fence forming a stock proof boundary which has been there for many years.

It is also the case that 1255B will lead to the loss of amenity value for the existing residents of this deprived area (index 6-8, and especially high in living environment) and the many people using the right of way across the site. Much can be same for the Coach Road sites. There are highly likely to be other more suitable sites in Leeds than these.

We hope we have made our point that there is a great deal more work to do to assess Green Belt purpose evidence in a comprehensive review, in order to find the best sites for Leeds' aspirational housing target. We will point out that 8,000 much needed family houses could be built in Leeds City Centre South. This happens to be, from our initial evidence, where many of the people who buy houses in Outer Leeds North West, including Aireborough, come from – because there are no family homes near their single persons flats, once they get married and have a family. Given that the major employment sites are in Leeds, and that much infrastructure is in place this would seem to be a far more sustainable solution. Therefore, we do not feel Development Plans Panel should be accepting any sites for Aireborough, apart from brownfield, at this stage.

Finally, the upset caused to local people by these site allocations, and the increase in that upset if they are approved, is leading to a number of people asking what further recourse to Government and/or the legal process residents have, even at this stage.

In setting up the Aireborough Neighbourhood Forum, we sought to persuade local people that they could have a much needed voice; Leeds City Council has proved us wrong. Residents are therefore losing faith that a Neighbourhood Plan that has to conform to the LDF is worth pursuing; in fact we cannot pursue this site allocation proposal as we know now it would not be accepted at the referendum stage, let alone examination for aspects such as Green Belt purpose and sustainability in the neighbourhood plan area. Many people feel therefore that other means to challenging Leeds plans may be more successful in creating a sustainable community, where wellbeing, placemaking, and local distinctiveness are core principles for planning.

Yours sincerely

Jennifer A Kirkby

Jennifer A Kirkby
for and on behalf of Aireborough Neighbourhood Development Forum