

Guidance on How to Respond to the Leeds City Council Public Consultation on Planning

Key Facts

- **Deadline is 5.00pm 16th November.**
- The Planning Inspector is the judge who will be presented with evidence from both sides. Your responses have to prove the LCC plan is not sound.
- All responses, whatever format count; but the more specific points of objection the better.
- Be clear which sites you are referring to. Some comments will relate specifically to an individual, or group of sites, others the whole of Aireborough.
- Responses can be **per person, not per household**.....let's use every opportunity we can!

Ways to respond:

Online Response Form: <http://www.leeds.gov.uk/council/Pages/Site-allocations-plan-publication.aspx> you will need to then go to the **red button** to access the form. Or, you can print it off and hand write it from here <https://aireboroughnf.files.wordpress.com/2015/09/sap15responseformeditablepdf.pdf>

The form only allows you to address one site or collection of sites (e.g. Coach Road fields) at a time; it will be easier to email!

Email to: sap@leeds.gov.uk

Letter to: LDF Publication Draft Consultation, Forward Planning, The Leonardo Building, 2 Rossington Street, Leeds LS2 8HD

More information can be found at.

- LCC Site Allocations Plan document for Aireborough <http://www.leeds.gov.uk/SiteAllocationMaps/SAP%20and%20AVL%20Documents/01%20Aireborough.pdf>
- Leeds City Council Planning website <http://www.leeds.gov.uk/council/Pages/Site-Allocations-Development-Plan-Document-%28LDF%29.aspx>
- Aireborough Neighbourhood Development Forum (ANDF) Guidance Notes <https://aireboroughnf.wordpress.com/2015/10/03/your-guide-to-the-leeds-site-allocation-consultation-22-sept-16-nov-2015/>
- Detailed overview of 'soundness' prepared by ANDF <https://aireboroughnf.files.wordpress.com/2015/10/test-of-soundness-guide.pdf>
- LCC Interactive Map of sites <https://leedscsc.maps.arcgis.com/apps/webappviewer/index.html?id=409a1efd0ecb427d8ae3878f98468985>

**The Coach Road fields are currently allocated for 83 houses plus a school. How can they put a school (presumably a primary) on a site with such poor access? 300 children plus ~40 staff and the whole of Silverdale would be gridlocked. Previous plans looking at a school on the High School fields (near the Green Meadows Special School) were thrown out following local objections, leading to the current expansion of St Oswald's. Whether the school goes ahead or not will clearly impact on 'access to schools' in this. We've heard that both the 'highways' & 'schools' parts of LCC think a school is not viable on this site but that is purely rumour. If a school isn't built here, it will have to go somewhere else & presumably more houses would be allocated instead.*

Email/Letter (All email responses need to cover the elements of the LCC consultation online response; addressing the same questions and using the same language. It'll be easier for the Planning Inspector to be clear about what your comments relate to if you stick to a similar format, Use bullet points and make sure it's clear which sites you are referring to – **use the site numbers!**)

Content		Additional information/Help
Your details	Minimum of name, address & postcode	
State	You are commenting on the Leeds Site Allocations Plan	
State	Which sites you are referring to.	The Coach Road Fields are now collectively known as: HG2-5 (sites 2163a / 1180a /1311a) The Allotments are: HG2-6 (1113).
State	That you think the plan is NOT SOUND	<p>This is the Key Part of the response and shouldn't be a 'cut & paste' response as this will count against it; but use the examples of discussion points raised</p> <p>The Council for the Protection of Rural England (CPRE) advise the following when commenting on the Tests of Soundness for local plans. This means they should be: Positively Prepared; Justified; Effective; and consistent with National Policy.....Ask yourself:</p> <p>Is the plan Positively Prepared? Does the plan seek to meet the local needs for housing, land for businesses, community facilities, infrastructure (e.g. for transport, water, energy), education, shops, facilities for sport and leisure etc., which have been identified through the studies which make up the evidence base?</p>
Positively Prepared	<ul style="list-style-type: none"> • No assessment of local housing needs • Excessive development in Aireborough & surrounding areas in recent years has put excessive strain on local roads / infrastructure / services already. No infrastructure plan for Aireborough. No evidence base gathered by LCC. • No brownfield sites left • No consultation with Community or Bradford. 	
Justified	<ul style="list-style-type: none"> • No evidence gathered therefore impossible to judge! • The 'plan' is merely a desire to build 70,000 houses on the land offered by developers • Multiple breaches of NPPF (National Planning Policy Framework) • Alternative sites near motorway network / close to jobs not properly explored 	<p>Is it Justified? Is the chosen strategy the best one compared with the alternatives considered? Is it clear how the (LCC) Sustainability Appraisal has informed the plan (the Sustainability Appraisal report should set this out, and can help you to compare alternative options)? Has the plan been prepared with participation of the community? Is it clearly founded on evidence – backed up by facts?</p>
Effective	<ul style="list-style-type: none"> • A school on Coach Road is ludicrous, very poor site access • Multiple breaches of NPPF 	<p>Is it Effective? Is there information on how the plan will be delivered during its life time (e.g. an 'implementation plan')? Does this say whether other delivery partners (e.g. strategic rail and highway authorities, the Environment Agency, water companies) are signed up to the plan? Is</p>

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<ul style="list-style-type: none"> No implementation plan for Coach Rd – or any details of the school provider, size etc. or for the allotments sites (currently 3 owners are refusing to sell to a developer) <p>Consistent with the NPPF</p> <ul style="list-style-type: none"> Multiple breaches – 31 sections out of 219 Specifically; 30,32,34,35,36,37,38,69,70,73,74,75,76,79,80,81,83,86,87,88,89,93,95, 109,110,111,114,117,118,178 & 179 NB – don't copy & paste the above, if you have time, look at the relevant sections of the NPPF & make a specific comment about as many of them as you can! <p>State That you disagree with the proposed development and which of the following recommended themes you wish to comment on:</p> <p>Ecology, Local Services, Schools, Conservation, Loss of Greenbelt & Highways</p> <p>Ecology / Landscape:</p> <p>Local services / facilities:</p> <p>Schools:</p> <p>Conservation / Heritage:</p> <p>Loss of Greenbelt:</p>	<p>Is there an indication of when sites will come forward? Is it clear how the plan will be monitored? Is it flexible – able to deal with changing circumstances (e.g. what if a big site doesn't come forward for development when expected)?</p> <p>Is it consistent with National Policy as set out in the National Planning Policy Framework (NPPF)?</p> <p>Why is the landscape important to you? What do you like about the sites? Are there any trees / other plants are on the sites which would be affected by development? What birds & animals have you seen there? There is a green link corridor connecting the Engine fields nature reserve in Yeadon with the wider countryside (Coach Road fields to Esholt Woods)</p> <p>The impact on doctors, dentists, leisure facilities, allotments?</p> <p>Impact of development on school places.* Hundreds of school children currently use the Sustrans/Coach Road Route to Guiseley School.</p> <p>The lack of justification of building on Greenbelt and Greenfield. All 3 Coach Road sites are within designated Green Belt & 'Special Landscape Area'. Guiseley Conservation Area incorporates site 2163a; site 1180a and part of 1311a are within the 100m buffer zone. The area leads down into Esholt Woods down Springs Road which is an ancient 'green' lane. The allotments are designated as a Greenfield site; they have been in existence since 1921 when Park Gate Allotments were formed on land once owned by a local mill owner.</p> <p>The unsoundness of the fact that over 90 % of the sites in Aireborough to be allocated are Greenbelt.</p> <p>There are 5 official greenbelt purposes below, consider commenting on why these sites should</p>

Content	Additional information/Help
<p>Highways / transport:</p>	<p>remain as greenbelt:</p> <ul style="list-style-type: none"> • To check the unrestricted sprawl of large built-up areas • To prevent neighbouring towns from merging into one another (Coalescence of Areas) • To assist in safeguarding the countryside from encroachment • To preserve the setting and special character of historic towns • To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. <p>You could mention the fact that most of Aireborough's brownfield sites have been built on in recent years & that other brownfield sites elsewhere in Leeds should be looked at. Aireborough has had 3,367 houses built since 967 since 2012 and going up all the time</p> <p>The lack of positive planning & ineffectiveness of the impact of extra housing/a school on the estate & the wider impact on the A65 and beyond</p> <p>You may wish to consult the sustainability documents prepared by Silverdale Action Group for more info (NB these are still being updated and will be re-posted as they are)</p> <p>Coach Road: https://aireboroughnf.files.wordpress.com/2015/06/full-sustainability-assessment-coach-road-sites-2163a-1180a-1311am.pdf Allotments: https://aireboroughnf.files.wordpress.com/2015/06/full-sustainability-report-coach-road-allotments-1113m.pdf</p>
<p>Point out, in your own words that the following errors were made in the Sustainability assessments of the sites & has therefore not been positively prepared & is unsound.</p> <ul style="list-style-type: none"> • No traffic survey of the sites. • No ecology survey – assessment based on negligible data, • Inadequate flood risk assessment which ignores known springs, • Failure to assess impact on air quality (N02) with huge increase in traffic / local gridlock, • Ignored the fact that it was a Conservation Area & Special Landscape Area, • Access to education and a negative impact on the local community 	<p>Leeds City Council SHLAA can be found here:</p> <p>http://www.leeds.gov.uk/docs/SHLAA%202014%20Full%20Report%20Feb%202015.pdf</p>
<p>In your own words suggest what could be done to make the Plan SOUND.</p> <p>Consider comments on the following:</p> <ul style="list-style-type: none"> • Reducing the Leeds housing target from 70,000 to 44,000 (ONS data) • Abiding by the National Planning Policy Framework (NPPF) 	<p>A Comprehensive Greenbelt Review has not been carried out by LCC, contrary to recommendation by the previous planning inspector. He found that the Core Strategy was not sound without a Comprehensive Greenbelt Review, in fact this was the only recommendation made, yet Leeds City Council chose to ignore it. Had this been done these sites would not have made it into the plan.</p>

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<ul style="list-style-type: none"> • Carrying out a review of housing need as data out of data, carrying out a housing need survey locally. • Taking advantage of the new brownfield funds and schemes that make brownfield more viable for developers. • Having an infrastructure plan in place before the site allocations plan. • Build closer to area with better infrastructure • Build closer to where the bulk of the jobs are, e.g. Central Leeds or Aire Valley • Carry out a comprehensive Greenbelt review; as required by the previous Planning Inspector • Conserving Conservation areas; for local distinctiveness & character • Respecting Special Landscape Area designation; for local character and distinctive as well as sustainability • Allocate the allotments as community allotments do not allow them to be left as wasteland by absentee landowners. • Genuinely engage with local communities, don't pay lip service to consulting the public • Cooperation with Bradford Council 	<p>You can reference:</p> <p>http://www.leeds.gov.uk/docs/S6-4%20DPP%20S6.pdf</p> <p>LCC have a duty to cooperate with Bradford especially in the many Aireborough sites with border areas. Esholt woods are under the jurisdiction of Bradford Council and the Coach Road fields are discussed in their own Wildlife Area Evaluation for Esholt Woods yet no regard has been placed on this area by Leeds.</p>
<p>Next state that you do not consider the plan to be legally compliant for these reasons:</p> <ul style="list-style-type: none"> • Statement of Community Involvement • Sustainability Appraisal report • Town & Country Planning (local Planning) Regulations • Duty to Cooperate 	<ul style="list-style-type: none"> • No community involvement. • No genuine attempt to engage with the local community (no attempt to educate people on what is being proposed & how they can get involved, all local publicity on the proposed developments has come from amateur activists), • No collaboration with Bradford, • No adherence to many sections of the NPPF or Leeds own planning policies and seemingly little internal collaboration between different elements of LCC – highways, school planning, ecology etc.
<p>Comment in your own words using notes in column 2</p> <p>If you may want to be involved in the public consultation state it.</p>	<p><i>You can always pull out later but may not be able to opt back in. Don't tick yes if you definitely don't want to – ultimately we want to get the Planning Inspector on our side & wasting their time won't help</i></p>
<p>If you would like to be notified of the submission of the plan for public examination and/or the adoption of the plan state it.</p>	
<p>Add name and address if not listed earlier</p>	