

CONSULTATION ON CHANGES TO AIREBOROUGH'S SITE ALLOCATION PLAN



A Guide to Responding

March 2017

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THE SIMPLE GUIDE TO HOW TO RESPOND

- You need to respond by Monday 27th March 2017 to

SAP Pre Submission Changes
Policy and Plans Group
The Leonardo Building
2 Rossington Street
Leeds LS2 8HD

Email: sap@leeds.gov.uk

- In this guide we have listed all the major site changes in the Aireborough Neighbourhood Plan area, and where to find more information. We have also given some key points that have been made by members of the Neighbourhood Forum who know the sites well; you can use these for the basis of your own response or add your own. At the end of this document we have included a template email/letter to complete in your own words. (NB There are also sites in Rawdon and Horsforth you might like to comment on, you will find details on the Leeds Consultation page <http://www.leeds.gov.uk/council/Pages/Site-Allocations-Plan-Pre-Submission-Changes.aspx>)
- This consultation is JUST on the changes that have been made to the Site Allocation Plan since the last consultation in Autumn 2015.
- If you responded to the Autumn 2015 consultation, then your response should have been captured here. You might like to check that it has been accurately recorded, as it has come to our notice that some haven't. <http://www.leeds.gov.uk/council/Pages/Site-Allocations-Plan-Publication-Draft-Representations%E2%80%99.aspx>
- Both the response to this consultation on the changes and the response to Autumn 2015 will go to the Inspector who will conduct the enquiry into the soundness of the Leeds Site Allocation Plan – probably in the Autumn of 2017
- You can either respond using the online form, by letter or by email. If you only want to comment on one change then the online form may be useful, if you want to comment on more than one change you will have to fill out different online forms, so may prefer the email or paper option. The online form is here. <http://www.leeds.gov.uk/council/Pages/Site-Allocations-Plan-Pre-Submission-Changes.aspx>
- All comments must be made in the context of **if the plan is sound or not**. If you think the plan is unsound you need to say so try and list your comments under one of the tests of soundness. We have produced a more detailed but easy to read guide to soundness here <https://aireboroughnf.files.wordpress.com/2015/10/test-of-soundness-guide.pdf>
 - Positively Planned (*have key aspects of needs, the area and the site, been properly assessed and that information used to inform the decision?*)
 - Justified (*have all alternative sites been examined to meet the needs and evidence and the best option chosen?*)
 - Effective (*is this site capable of being delivered effectively with right infrastructure, cost, and partners?*)
 - Consistent (*is the use of the site and the plans for it consistent with planning regulations?*)



- Give as much evidence for your comment as possible, pictures, reports, statistics, quotes from the Leeds Core Strategy or the National Planning Policy Framework. You will find useful documents on our website here <https://aireboroughnf.wordpress.com/library/>. Email us if we can help you aireboroughnp@gmail.com
- As frustrating as it is, it's better to make 1 good comment with evidence than to have a 3 page rant which doesn't address any of the above points of soundness.
- Try and make positive suggestions for what should happen to the site to make the plan sound. And if you feel parts of the change are sound say so as well.
- You can also add comments on whether you think the plan is legally compliant according to the
 - Statement of Community Involvement
 - Consultation of appropriate Statutory Bodies
 - Duty to co-operate with neighboring Local Authorities eg Bradford
 - Planning & Compulsory Purchase Act 2004(Planning process–Local Development Framework)
 - Town and Country Planning Regulations 1990 (Development and use of land - NPPF)
 - Leeds Sustainability Appraisal Report
- **Make sure you include your name, address and email in your response. Anonymous responses are not accepted.**

We know this is yet another consultation which takes time to complete, but community involvement in planning is increasingly seen as important in legislation, and if we do not say what we think is the right and wrong course of action based on needs then we have little room to complain. If the Inspector sees no comments to the changes made, they may well think all is sound. It is possible to make our voices heard; we just seem to have to repeat things over and over again.

HG2-1 NEW BIRKS FARM, INGS LANE GUISELEY

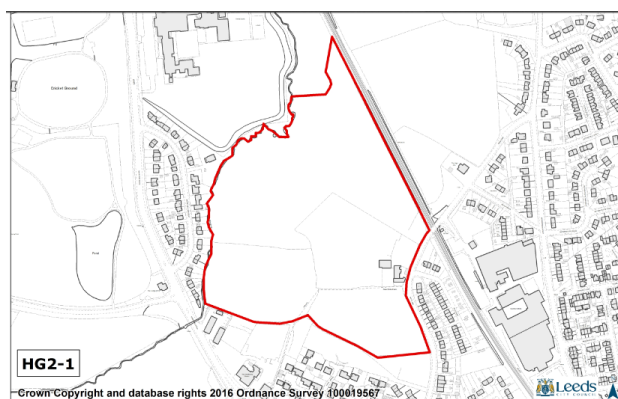
Aireborough Housing Target	2,300 Core Strategy	2,014 Current SAP Target
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HG2-1 New Birks Farm, Ings Lane Guiseley – Green Belt	
Site Capacity	reduced from 285 units to 160units
Site Area	10.84 hectares, site size has not been reduced
Development phase	2

Green Belt Assessment	Leeds' Assessment 2015 – as at June 2016 . Changes to detail of Sustainability Assessment
Check the unrestricted sprawl of large built up areas	Low potential to lead to unrestricted sprawl
Prevent neighbouring towns from merging	No merging of settlements
Safeguard the countryside from encroachment	Site does not perform an important role in safeguarding from encroachment
Preserve the setting and special character of historic towns	No effect on the setting and special character of historic features . Marginal effect on the setting and special character could be mitigated against through appropriate detailed design.
Overall Conclusion	Site is well contained development would round off the settlement

Sustainability Assessment June 2016

http://www.leeds.gov.uk/SiteAllocationMaps/SAP_PreSubmission_Site_Assessments/Site%20Assessments%20Aireborough%20Housing.pdf



http://www.leeds.gov.uk/SiteAllocationMaps/SAP_PreSubmission_Changes/02%20SAP%20Submission%20Draft%20Plan%20Aireborough.pdf page 43

CHANGE 59 AND 64 – CAPACITY Amend site capacity from 285 to 160

CHANGE 65 - HERITAGE CHARACTER Amend Conservation Area site requirement: A small part of the site is within the Guiseley Conservation Area and the remainder affects its setting. Any development should preserve or enhance the character or appearance of the Conservation Area. Views through the site from Ings Lane towards the High Royds Tower should be maintained. Development should be set back from New Birks Farm and the existing positive buildings, namely the farmhouse, adjoining stone barn and small scale curtilage outbuildings, should be reused and refurbished as part of the development. Further guidance on these requirements is provided in the Heritage Background Paper.

http://www.leeds.gov.uk/SiteAllocationMaps/SAP_PreSubmission_Changes/G%20Heritage%20Background%20Paper%20Final%20Draft%20Jan%202017.pdf See page 27. Sustainability Assessment score amended to – no change

Change 66 - FLOOD RISK Add new Flood Risk site requirement: "A flood risk appraisal, which includes hydraulic modelling of Mire Beck, has been undertaken for this site. This has shown that the western part of the site is at risk of flooding in the 1 in 20 AEP event (functional floodplain). No built development may take place in this part of the site, which should only be used for water compatible uses (such as public open space). Flood pathways should be provided through the site to mitigate the risk of surface water flooding and the risk of flooding in the event that the capacity of the drainage system is exceeded. Further guidance on these requirements is provided in the Flood Risk Background Paper."

http://www.leeds.gov.uk/SiteAllocationMaps/SAP_PreSubmission_Changes/C%20Submission%20Draft%20Flood%20Risk%20Sequential%20Background%20paper.pdf Sustainability Assessment score amended to – no change

MATERIAL CHANGE IN CIRCUMSTANCE SINCE 2015 – NOT NOTED IN LCC PAPERS

The Bradford Core Strategy has been approved by an Inspector in 2016, but since October 2016 has been on hold with the Secretary of State over the amount of green belt being used in Wharfedale under the exceptional circumstance rule, instead of using brownfield land.

In addition, Leeds and Bradford have not co-operated on a strategic green belt review across their boundaries. Leeds has not done a strategic review only site specific assessments, this is Bradford's.

Bradford Strategic Green Belt review - Bradford Growth Assessment, carried out by consultants Broadway Malayan in November 2013

<https://www.bradford.gov.uk/Documents/EvidenceBase/Bradford%20Growth%20Assessment//C.%20Local%20Growth%20Centres.pdf>

SEE RESIDENTS RESPONSE.

The Plan is unsound because:

NUMBER OF HOUSES AND INFRASTRUCTURE

The number of houses has been reduced from 285 to 160 – however this is still higher than the capacity of 150 given in the "Preliminary Appraisal of Flood Risk" by Weetwood Services, (initiated by LCC)

In addition, there is **still no plan** for future infrastructure and the cumulative effect of all the housing allocations in Aireborough. No real assessment has been done on the access to each site or the extra traffic it will impose on already very congested roads further affecting air quality which already exceeds EU standards.

This situation has been exacerbated by Bradford Metropolitan District Council's Local Plan for the Wharfe Valley and North East Bradford which adjoins Aireborough and which has been approved since the last SAP public consultation in 2015 – and is therefore a material change in circumstances.

This means the Leeds SAP is not consistent with national policy or positively prepared.

It would appear that Leeds and Bradford are not collaborating when deciding where housing is planned in terms of roads and traffic congestion, each site's sustainability being appraised in a vacuum. Developments in Menston, Burley, Ilkley and Apperley Bridge will all impact on the A65. Not enough consideration is given to this.

This means that the plan is not positively prepared

FLOOD RISK

Flooding has become a major issue on the site which is reflected in the flood report "Preliminary Appraisal of Flood Risk" by Weetwood Services. (Page 361) of the LCC flood risk background paper.

http://www.leeds.gov.uk/SiteAllocationMaps/SAP_PreSubmission_Changes/C%20Submission%20Draft%20Flood%20Risk%20Sequential%20Background%20paper.pdf

Approximately half the site is now recommended for water compatible uses such as public open space, with housing on the remainder. However building on the eastern side of the site, where the report shows

to be at risk of moderate to significant groundwater flooding will cause more immediate run off of rainwater, inundating the area below, filling Mire beck more quickly to capacity, with the potential of flooding adjacent gardens and properties and having knock on effects further down stream in Otley where flooding is a major problem along the river.

Mitigation may still not be enough to make the site sustainable especially given recent research done by Professor Rhodes on sites in Menston, just across the A65.

<https://menstonactiongroup.wordpress.com/2016/05/11/flooding-a-novel-solution-2/>

This has found that ground water is likely to be 10 times more than Environment Agency models, <https://www.facebook.com/aireborough.voice/posts/1257359847609481:0>

As a result, building on sites in Menston have been halted and planning permission has run out.

There have been many 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. The Environment Agency is monitoring the situation. This hazard to public health needs to be addressed prior to any further housing consideration in the area. Ironwork is often lifted from the sewer system by pressure of storm water. This has not been taken into account by either Leeds City Council or Bradford Metropolitan council in their housing allocations

This would all indicate that the plan has not been positively prepared, is not justified and is not likely to be effective because of viability and lack of joint working cross-boundary on strategic infrastructure.

GREEN BELT

The site is Green Belt; however the plan describes the site as 'Greenfield' which is misleading.

The Ings is instrumental in defining Guiseley as a settlement separate from Menston, along with adjacent Green Belt land and site HG3-1 (114 houses) (Safeguarded Land, Green Belt), Mire Beck forms the boundary. Development would merge the two settlements, contrary to Green Belt purpose. **There is no new green belt boundary drawn for the extent of the housing now planned** nor a plan for the extent of the proposed 'Public Open Space' which would presumably stay in green belt, or would it? The SAP is just not clear about the extent or purpose of green belt around the Ings site, and indicates there has been no attempt at defining a green belt boundary that has longevity which there should be if a proper comprehensive review had been done.

In addition, The Bradford Metropolitan District Council Local Plan is currently paused with the Secretary of State over issues with the amount of Green Belt being allocated in Wharfedale under the exceptional circumstance rule and its use before Brownfield – the Ings site is part of the same area although it is in Aireborough, Leeds. This is a material change since the last SAP consultation in 2015. There are also indications with the Leeds response to the Bradford plan that Leeds and Bradford have not collaborated in a comprehensive green belt review in the area. As an example, the Bradford Green Belt Review does not mention Aireborough, or the Leeds Core Strategy

This means the Leeds SAP for this site is not positively prepared, not justified, not effective and not consistent with national policy.

The plan is not legally compliant with regards to Aireborough:

LEEDS CITY COUNCIL have not fulfilled their Duty to Cooperate

A fully comprehensive Green Belt review has not been carried out as specified by the inspector at the Core Strategy hearing. In addition a green belt review has not been done in conjunction with Bradford Metropolitan district Council. (See above)

In their background paper of September 2015, only one meeting is recorded with City of Bradford Council, on 6th March and one more following the Bradford Plan release and pause.

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

HOW LEEDS CITY COUNCIL CAN MAKE THE PLAN SOUND

- Issue revised documentation showing the extent of the proposed new housing boundary on site HG2-1
- Reduce the Leeds housing target from 70,000 to 44,500 (ONS data) reducing the need to build on Green Belt land
- Carry out a comprehensive Green Belt review with Bradford Metropolitan District Council
- Have an infrastructure plan in place before the site allocations plan which includes traffic management taking into account the air pollution which already exceeds EU recommendations
- Build closer to areas with better infrastructure
- Build closer to where the bulk of the jobs are, e.g. Central Leeds. to reduce traffic congestion and pollution
- Cooperate fully with Bradford Council on the planning of Aireborough and Wharfedale

HG2-2 WILLS GILL, GUISELEY

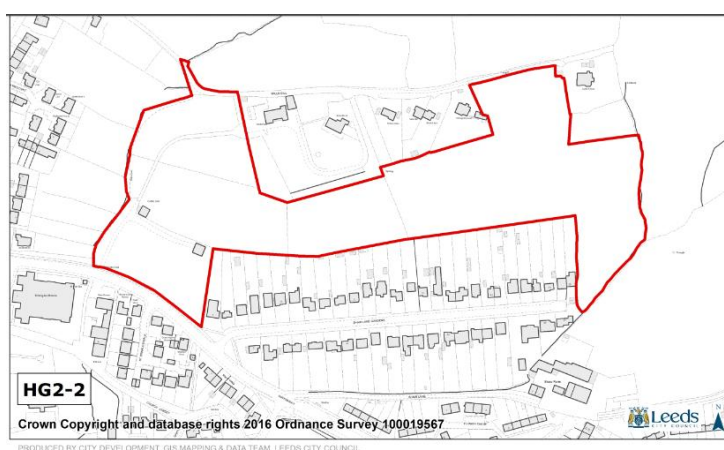
Aireborough Housing Target	2,300 Core Strategy	2,014 Current SAP Target
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HG2-2 Wills Gill, Guiseley– Green Belt	
Site Capacity	133 units. Has stayed the same despite a substantial buffer zone being one of the key changes – see pink area in the map 2 below.
Site Area	5.06 hectares, site size has not been reduced despite buffer zone
Development phase	2

Green Belt Assessment 2015	Leeds' Assessment 2015 – as at June 2016 . Changes to detail of Sustainability Assessment
Check the unrestricted sprawl of large built up areas	Low potential to lead to unrestricted sprawl
Prevent neighbouring towns from merging	No merging but there is no defensible boundary
Safeguard the countryside from encroachment	Site does not perform an important role in safeguarding from encroachment
Preserve the setting and special character of historic towns	Marginal effect on the setting and special character could be mitigated against through appropriate detailed design.
Overall Conclusion	The site is well connected to the urban area. The site is located within the Conservation Area but it is considered that mitigation measures can be put in place to protect the setting and character of the conservation area.

Sustainability Assessment June 2016

http://www.leeds.gov.uk/SiteAllocationMaps/SAP_PreSubmission_Site_Assessments/Site%20Assessments%20Aireborough%20Housing.pdf

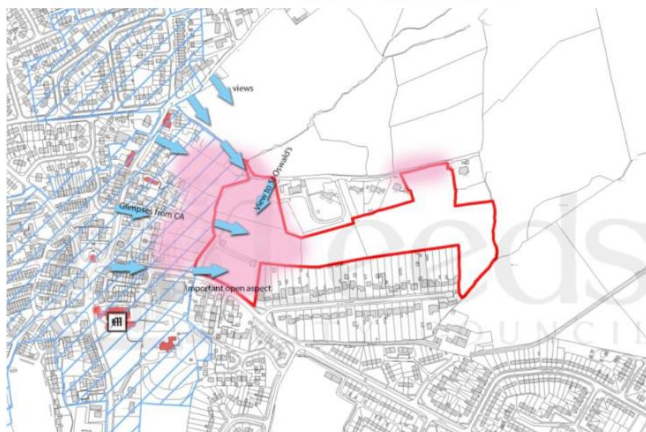


Map 1 – Original

http://www.leeds.gov.uk/SiteAllocationMaps/SAP_PreSubmission_Changes/02%20SAP%20Submission%20Draft%20Plan%20Aireborough.pdf page 45

CHANGE 67 - HERITAGE CHARACTER Amend Conservation Area site requirement: This site affects the setting of the Guiseley Conservation Area. Any development should preserve or enhance the character of adjacent surviving medieval field systems and views of St Oswald's Church. **This should be a natural form rather than an overtly domesticated or managed space.** A landscaped buffer will also be required between the new housing development and this open space. Further guidance on these requirements is provided in the Heritage Background Paper.

The plan below illustrates views and the areas of higher sensitivity on the site,



Map 2 – Site with changes following historical assessment.

SEE POINTS FROM RESIDENTS' RESPONSE.

Not positively planned

- Points made in the historical assessment acknowledge the importance of the historic setting and views to open country, but the changes still admit that development of site HG2-2 will affect some views, subsequently affecting the Conservation Area. This would indicate that the green belt assessment should be changed on protecting against urban sprawl, safeguarding the countryside from encroachment and preserving the character of historic towns. With these changes the site still fulfils green belt purpose and should not be considered for green belt enhancement under NPPF 81. Protecting from urban sprawl was the conclusion made by LCC in their 2013 Issues and Options Document, **when the site was deemed not suitable for development. The reason for the subsequent decision to develop has never been clearly made to residents.**
- The buffer zone creates a blob of urban development in green fields, which when combined with site HG2-3 Shaw Lane merges Yeadon and Guiseley in a distorted way creating even less of a defensible boundary for the green belt.
- The proposed changes still fall short of protecting the long distance views out of the town, over the site to the surrounding countryside. Protecting these views – which tie the town to its surroundings – is a stated priority within the Guiseley Conservation Area Appraisal and would fall within Policy P11 of the Core Strategy.

Not effective

- It is highly unlikely that the site capacity of 133 units could be delivered given the extent of the natural and landscaped buffers that are being proposed as mitigation to protect the western end of the site adjacent to the tofts and crofts. The original site proposal was for 133 units over 5.06 hectares. The map produced by the Council as part of the changes show the areas of higher sensitivity that would need protecting by the buffers. Spatial analysis reveals this is likely to reduce the area that can be developed by 40%, to around 3 hectares. To achieve 133 units in this area would require a housing density of around 44 dwellings per hectare. This would be highly inconsistent with preserving the character or appearance of the conservation area and would probably be inconsistent with Policy H3 (density of residential development) in the Leeds Core Strategy (a further example of the changes to this site not being positively prepared).

- We are doubtful that the combination of a relevant density, and level of design needed to enhance the conservation area would make this a viable site for development.

Not legally compliant

- **Town and Country Planning Act - NPPF.** The site still fulfils many aspects of green belt purpose
- **Sustainability Appraisal** - the changes made do not make the site sustainable and deliverable in accordance with the Leeds Sustainability Appraisal and the associated mitigation - Environmental Objectives, most notably SA19 Enhance landscape quality, SA21 Preserve and enhance the historic environment.

What makes the plan sound?

This site should be retained as green belt and enhanced under NPPF 81 with a suitable use to be determined in the Neighbourhood Plan as part of the area's green infrastructure – the area is short of allotments. Whatever the use it, it should enhance the conservation area, particularly the crofts on Town Street. It should also be aware of the heritage of Shaw Lane Gardens as allotment plots.

HG2-4 HOLLINS HILL & HAWKSTONE AVENUE, GUISELEY

Aireborough Housing Target	2,300 Core Strategy	2,014 Current SAP Target
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HG2-4 Hollins Hill & Hawkstone Avenue, Guiseley – Green Belt	
Site Capacity	80 units.
Site Area	3.04 hectares
Development phase	2

Green Belt Assessment 2015	Leeds' Assessment 2015 – as at June 2016 . Changes to detail of Sustainability Assessment
Check the unrestricted sprawl of large built up areas	Low potential to lead to unrestricted sprawl
Prevent neighbouring towns from merging	No merging of settlements, but there is no defensible boundary
Safeguard the countryside from encroachment	Site does not perform an important role in safeguarding from encroachment
Preserve the setting and special character of historic towns	Marginal effect on the setting and special character of historic features. Could be mitigated against through appropriate detailed design.
Overall Conclusion	Development would form an extension to the existing residential area on the eastern boundary. Proximity of Listed Building and its setting would prevent unrestricted urban sprawl.

Sustainability Assessment June 2016

http://www.leeds.gov.uk/SiteAllocationMaps/SAP_PreSubmission_Site_Assessments/Site%20Assessments%20Aireborough%20Housing.pdf



Map 1 – Original

http://www.leeds.gov.uk/SiteAllocationMaps/SAP_PreSubmission_Changes/02%20SAP%20Submission%20Draft%20Plan%20Aireborough.pdf page 49

CHANGE 68 - LOCAL HIGHWAYS Amend Local Highway Network site requirement: "There is a cumulative impact of development on the A65 corridor. The development will be required to contribute to measures to mitigate the cumulative impact of this and other allocated sites affecting the corridor. These measures may take the form of contributions towards more significant measures such as improvements to Park Road / A65 gyratory. The site is likely to significantly impact upon the A6038 / Hawksworth Lane junction and therefore an improvement is likely as part of the transport assessment, which may require a contribution of land from the development site"

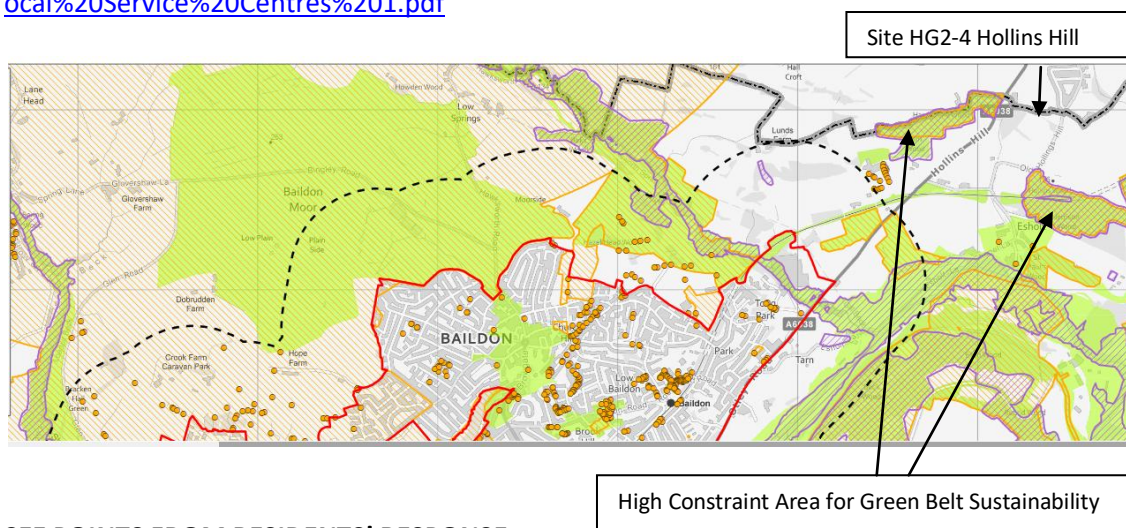
MATERIAL CHANGE IN CIRCUMSTANCE SINCE 2015 – NOT NOTED IN LCC PAPERS

The Bradford Core Strategy has been approved by an Inspector in 2016, but since October 2016 has been on hold with the Secretary of State over the amount of green belt being used in Wharfedale under the exceptional circumstance rule, instead of using brownfield land.

In addition, Leeds and Bradford have not co-operated on a strategic green belt review across their boundaries. Leeds has not done a strategic review only site specific assessments, this is Bradford's.

Bradford Strategic Green Belt review - Bradford Growth Assessment, carried out by consultants Broadway Malayan in November 2013 covering the Baildon and part of Esholt area

<https://www.bradford.gov.uk/Documents/EvidenceBase/Bradford%20Growth%20Assessment%5C/D.%20Local%20Service%20Centres%201.pdf>



SEE POINTS FROM RESIDENTS' RESPONSE.

Not positively planned

- **Heritage Assessment** – this site sits within the setting for four listed farms. Hawkstone Farm, Lane Side Farm, Hollins Hill Farm and Manor Farm. It is also the setting for the Tranmere Park conservation area. In this case, and given that other heritage assessments have been done on other Aireborough sites, **we are of the view that this site should also have a heritage assessment done to look at harm to the setting of these buildings and the conservation area, of both development and urban highways improvements.** Obviously an open environment is important for the conservation and enhancement of these heritage assets – see Core Strategy P11 Conservation. The Tranmere Park Conservation Area Appraisal supports this and says *“The impact of development on the character and appearance of the Conservation Area should be considered. This applies equally to development outside the area if it is likely to affect the setting of Tranmere Park.”*
- **Landscape Character Assessment and Green Belt Analysis** - a Landscape Character Assessment done for the Neighbourhood Plan in 2016, has identified this area as a Landscape tension point. It points out that this area is the top of Hollins Hill and highly visible in long distance views from the Chevin escarpment. It deems that the current development on Hollins Hill has already compromised the legibility of the Hawkstone Ridge, and is “profoundly insensitive”. Therefore, our view is that current SAP proposals can only add to this ‘insensitivity’ and this will have an effect on the setting of the heritage assets. This is supported by the Tranmere Park Conservation Area Appraisal which says – *“The rural views down into the Aire Valley from Hawksworth Lane are also important and provide high level vistas over the golf course to the West and towards Bradford district. The fields also provide attractive and important settlement separation from Hawksworth and retain the high ground free from development, both important to the overall character of the estate.”* There is also support for this in Bradford's MDC's Growth Assessment for Baildon and Esholt where Hawkstone Wood, a statutory ancient woodland which sits very close to the North West of the site has been deemed a Bradford

Wildlife Area and a high constraint site for Green Belt sustainability. The conclusion on the green belt in this area between Baildon and Guiseley is that *The Green Belt surrounding Baildon provides a significant contribution to the role of the West Yorkshire Green Belt. The Green Belt in this location has a significant role in preventing sprawl and ribbon development. The Green Belt contributes towards helping prevent Baildon from merging with neighbouring settlements such as Bingley and Guiseley* .(page 25, contained in <https://www.bradford.gov.uk/Documents/EvidenceBase/Bradford%20Growth%20Assessment%5C/D.%20Local%20Service%20Centres%201.pdf>). Meanwhile, Leeds' green belt analysis on the other side of the border is that "there is no merging of settlements and low potential to lead to unrestricted sprawl" – there does not appear to be consistency between the different assessments and therefore there cannot be positive planning.

Not justified

- **Capacity and Alternative Brownfield Sites** – this site is deemed to have the capacity for 80 houses, yet highways improvements, and design to mitigate harm to heritage assets and landscape are likely to reduce that number. The Neighbourhood Plan is of the view following an urban character assessment that there are other sites within the built environment, on brownfield land that could accommodate the smaller number of houses this site is likely to take.

Not effective.

- **Contribution to highway improvements on the A65** – the likely capacity of this site, given mitigation factors and proposed highway improvements is unlikely to make any meaningful contribution to A65 capacity improvement.

What makes the Plan Sound

This site is currently green belt farmland belonging to Hollins Hill Farm – the green belt assessment in the sustainability appraisal has now been changed to show that. It should retain this status as it makes the farm viable for cattle farming; removing the land makes the farm less viable.

It may be that improvements to the road junction at the top of Park Road may need a sliver of land, but this needs to be a properly engineered solution to fit in with the locality.

HG2-5 COACH ROAD GUISELEY

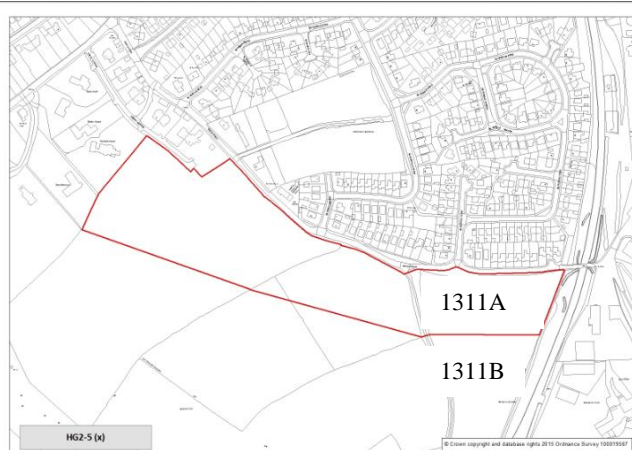
Aireborough Housing Target	2,300 Core Strategy	2,014 Current SAP Target
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HG2-5 Coach Road, Guiseley – Green Belt	
Site Capacity	83 units and a school, despite 23% reduction in hectares
Site Area	4.14 hectares, area has changed significantly and reduced from 5.35hectares
Development phase	2

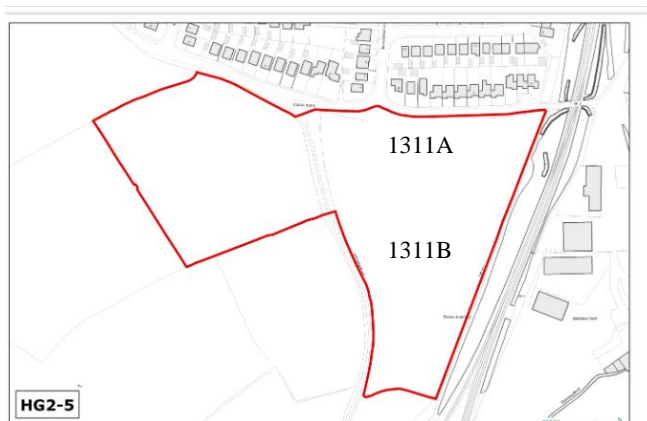
Green Belt Assessment	Leeds' Assessment 2015 – as at June 2016 . Changes to detail of Sustainability Assessment
Check the unrestricted sprawl of large built up areas	High potential to lead to unrestricted sprawl
Prevent neighbouring towns from merging	No merging of settlements but there is no defensible boundary
Safeguard the countryside from encroachment	Site does performs an important role in safeguarding from encroachment
Preserve the setting and special character of historic towns	No effect on the setting and special character of historic features Marginal effect on the setting and special character which could be mitigated against with appropriate design
Overall Conclusion	Relates well to the urban area . 1311 Relates well to urban area site boundaries follow existing tree lined field boundaries which currently provide a partial boundary that will help contain development and limit the potential that it might otherwise have had to lead to sprawl.

Sustainability Assessment June 2016

http://www.leeds.gov.uk/SiteAllocationMaps/SAP_PreSubmission_Site_Assessments/Site%20Assessments%20Aireborough%20Housing.pdf



Map 1 Original site proposal 5.35 hectares



Map 2 New site proposals 4.14 hectares with old site assessment numbers. Site 1311 was originally split into part A and B

See new SAP details

http://www.leeds.gov.uk/SiteAllocationMaps/SAP_PreSubmission_Changes/02%20SAP%20Submission%20Draft%20Plan%20Aireborough.pdf page 51

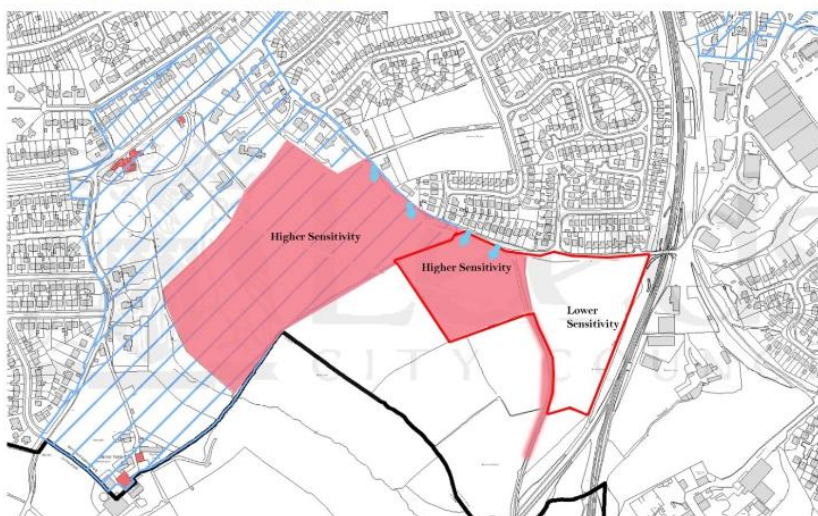
CHANGE 60 - REFERENCE SHLAA ref: 1311, amend address to: Land at Coach Road, Guiseley. Area changed from 5.3 to 4.1ha. Amendment to site boundary: the western part of the site, which is within the Conservation Area, should be excluded from the site, and the southern boundary should be revised to follow existing field boundaries'

CHANGE 69 - REVISED BOUNDARY Revised boundary of site. Reduce the area from 5.35 hectares to 4.14 hectares

CHANGE 70- HERITAGE CHARACTER Heritage assessment undertaken in response to Historic England's concerns. Amend Conservation Area site requirement: The site affects the setting of Guiseley Conservation Area. Any development should preserve or enhance the character or appearance of the Conservation Area. Development should retain and reinforce existing field boundaries. The eastern part of the site is least sensitive to development, and so should be the focus for the majority of residential development. The school should be located to the west of the site, and this part of the site should be sensitively designed to maximise the sense of openness and respond to the local character and parkland setting of the Conservation Area to the west of the site. Further guidance on these requirements is provided in the Heritage Background Paper.

http://www.leeds.gov.uk/SiteAllocationMaps/SAP_PreSubmission_Changes/G%20Heritage%20Background%20Paper%20Final%20Draft%20Jan%202017.pdf See page 38

proposed revised boundary for the site,



Map 3 – Showing the high sensitivity of the area to the Conservation area (blue diagonal lines)

SEE RESIDENTS RESPONSE.

In brief the summary of the changes are;

- The 'top' field (Park Road end) has been taken out as it is part of the Conservation Area.
- The middle field is being earmarked for a primary school & comments relating to sensitive development so as to minimise the impact on the conservation area.
- The middle & bottom field (near the railway line) have been extended down the hill to include the B section which had previously been separated out & red-listed. There is no explanation of what has changed to magically make the B section now appropriate for development. The only conclusion is that Leeds feels a need to maintain the acreage having lost the top field which is not an acceptable, or legal, approach to planning.
- Overall size of the site has decreased from 5.3 to 4.1 ha, a 23% reduction with no change to the number of houses (83).
- Whilst the acknowledgment of the Conservation area is to be welcomed nothing has fundamentally changed with regards to the key aspects of access and Green Belt.

Therefore we feel the plan is unsound

Not Positively Planned

- **Sustainability Assessment, - Green Belt Assessment** – Below are extracts from the LCC Sustainability Appraisal for their site 1311, which was split into parts A and B. Part B was not considered suitable for development. But has now been added back to 1311A and deemed suitable.

Green Belt Assessment	Leeds' Assessment on original site 1311B now added to SAP
Check the unrestricted sprawl of large built up areas	High potential to lead to unrestricted sprawl. Development would lead to unrestricted sprawl. The site is not well connected with to the built up area. It doesn't round off the settlement.
Prevent neighbouring towns from merging	Development would lead to physical connection of settlements. There are no boundary features to contain the development.
Safeguard the countryside from encroachment	Site does performs an important role in safeguarding from encroachment. However it contains Grade 1,2,3a agricultural land. It provides access to the countryside,
Preserve the setting and special character of historic towns	No effect on the setting and special character of historic features
Overall Conclusion	Development of this site would extend further into the green belt and not relate well to existing settlement patterns. It is considered unsuitable for development.

Not effective

- **Site Capacity** – the site has now reduced by 23% in area, but there has been no corresponding reduction in capacity. This could only result in a density that is not suitable for the location of this site on the edge of the settlement, with so much of it being of high sensitivity to the conservation area. In addition, no attempt has been made to reduce capacity and thus alleviate some of the highway issues relating to access to Silverdale Estate in general. This latter point is another criticism in the lack of positive planning based on needs.

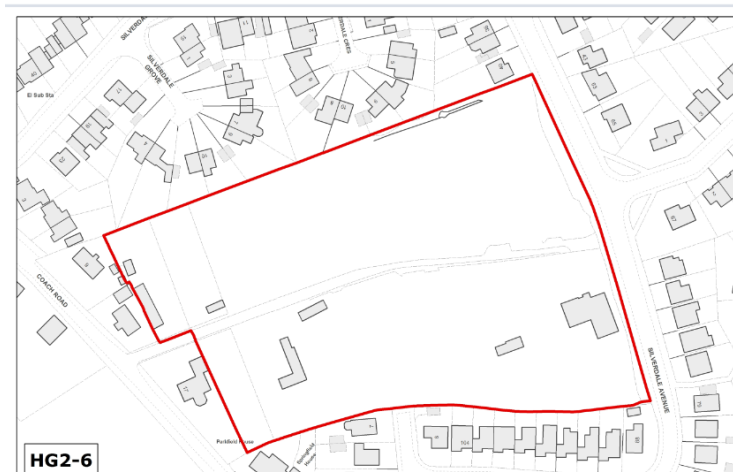
What would make the plan sound

We feel that the school would be better sited on Bradford Road near Fieldhead playing fields – this has the advantage of access, which the Coach Road site does not. There is then the issue of how this site can be enhanced under NPPF 81 to improve the area's green infrastructure. In the green belt assessment it clearly states that the land as agricultural value in category 1,2,3a, so ideally it should stay as farmland. Do add your own comments on this.

HG2-6 SILVERDALE AVENUE ALLOTMENTS, GUISELEY

Aireborough Housing Target	2,300 Core Strategy	2,014 Current SAP Target
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HG2-6 Silverdale Avenue Allotments, Guiseley Greenfield	
Site Capacity	32
Site Area	1.98 hectares
Development phase	1



Map 1 Original site

http://www.leeds.gov.uk/SiteAllocationMaps/SAP_PreSubmission_Changes/02%20SAP%20Submission%20Draft%20Plan%20Aireborough.pdf page 53

CHANGE 71 - GREEN SPACE REQUIREMENTS Amend Green Space site requirement: On site laying out of half of the site for allotments and / or an alternative green space typology dependent on local needs required. Layout and management to be agreed with the Council.'

SEE RESIDENTS RESPONSE.

In brief the summary of the changes are

- No real change from the original plan but a reiteration that half of the site should be retained as community allotments or green space. This is contrary to the plan put forward by Stonebridge who obviously want to build on the entire site.
- Key issues remain unaddressed; how an agreement will be achieved (currently x3 of the owners are refusing to sell), access rights & the problem of flooding in neighbouring gardens which has been exacerbated by the removal of the trees & vegetation.
- 32 houses are probably far too dense for this site given its location, environment, and the access issues. Such a number is not justified when there are better options for small sites that have been identified as part of the Urban Character Study done for the Neighbourhood Plan.

Therefore we feel the plan is still unsound. A sound plan needs a discussion with the allotment holders and involvement of the Neighbourhood Plan to look at options. The unit capacity for this site has been identified in the built environment, and it would be better to leave this site as green infrastructure growing back the trees that are obviously controlling the flooding.

HG2-9 VICTORIA AVENUE YEADON

Aireborough Housing Target	2,300 Core Strategy	2,014 Current SAP Target
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HG2-9 Victoria Avenue, Yeadon – Green Belt	
Site Capacity	102 units.
Site Area	3.9 hectares
Development phase	2

Green Belt Assessment 2015	Leeds' Assessment 2015 – as at June 2016 . Changes to detail of Sustainability Assessment
Check the unrestricted sprawl of large built up areas	Low potential to lead to unrestricted sprawl
Prevent neighbouring towns from merging	No merging of settlement
Safeguard the countryside from encroachment	Site does not perform an important role in safeguarding from encroachment
Preserve the setting and special character of historic towns	No effect on the setting and special character of historic features. Marginal effect on the setting and special character could be mitigated against with appropriate detailed design.
Overall Conclusion	Self contained between existing housing and airport runway. Development would constitute rounding off of settlement.

Sustainability Assessment June 2016

http://www.leeds.gov.uk/SiteAllocationMaps/SAP_PreSubmission_Site_Assessments/Site%20Assessments%20Aireborough%20Housing.pdf

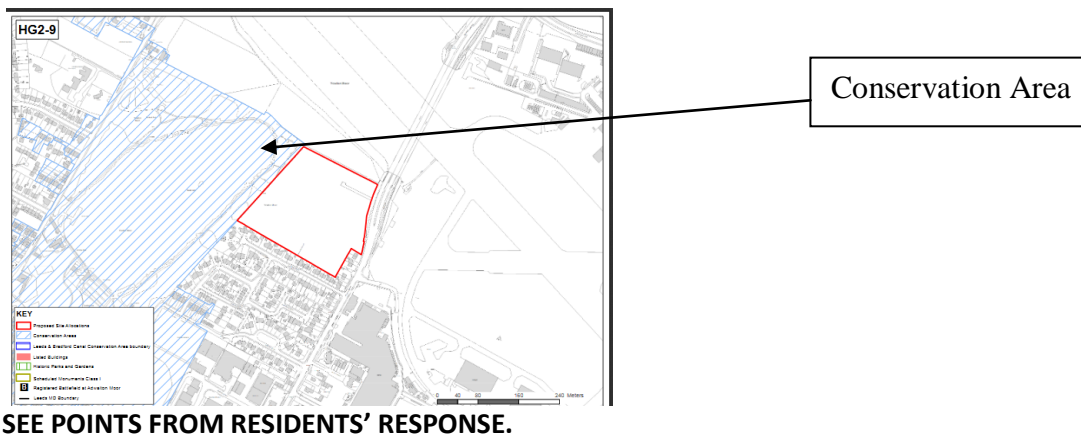


Map 1 – Original

http://www.leeds.gov.uk/SiteAllocationMaps/SAP_PreSubmission_Changes/02%20SAP%20Submission%20Draft%20Plan%20Aireborough.pdf page 59

CHANGE 72 - HERITAGE CHARACTER . Amend Conservation Area site requirement: The site affects the setting of Yeadon Conservation Area. Any development should preserve or enhance the character or appearance of the Conservation Area. Enhanced landscaping should be provided to the western and northern site boundaries. Further guidance on these requirements is provided in the Heritage Background Paper

http://www.leeds.gov.uk/SiteAllocationMaps/SAP_PreSubmission_Changes/G%20Heritage%20Background%20Paper%20Final%20Draft%20Jan%202017.pdf See page 44



SEE POINTS FROM RESIDENTS' RESPONSE.

Not positively planned

- Contradiction in this assessment; the value of site HG2-9 is providing an open, moorland setting to the part of the conservation area which is managed as a “moist wildlife meadow”. A feature of this ‘moorland setting’ is that there are few trees – *“The lack of substantial tree cover here is a characteristic and this last element of moorland landscape will be eroded by development.”*. Yet, the mitigation of harm from the site being developed is put forward as an **‘uncharacteristic’ buffer of trees** !! Surely, this too would ‘harm’ the conservation area. We maintain that this site, being a remnant of open, wet, moorland, contributes significantly to the setting of the ‘wilder’ part of the conservation area. Development of this site would harm this character, and the buffer would also do harm. This is not a positive strategy for the conservation and enjoyment of the historic environment under **Paragraph 126 of the NPPF**.
- Assessment - *“The loss of this site to insensitive development would cause limited harm to the conservation area.”* How can insensitive development fail to cause harm??
- Harm can be outweighed by public benefits, **NPPF, Paragraph 133 or 134** but houses so close to the noise at the end of the runway are not an attractive proposition. The one attraction of the site for residents would be views to the conservation area, especially as there is a gently rise to the east – yet, it is suggested that houses are hemmed in by a robust buffer blocking this view. This means that there is little public benefit outweighing the harm. This does not seem to be a positive plan, but rather how do we fit the ‘ugly sister’s foot into Cinderella’s glass slipper’.

Not effective

- Housing on the site should be ‘distinctive’ *“harm will be limited, and could be mitigated if suitable distinctive forms of buildings can be employed”*; distinctive housing often carries a premium price, this will be considerably down weighted by the location of the site so close to a noisy runway. Will distinctive housing be viable for a volume developer; we do not think this would be an attractive proposition for self-build. What type of ‘distinctive housing’ replaces the enhancing aspect of open, treeless moorland? It seems a contradiction of ideas unless planning underground bunkers.

This is what makes the plan sound

- This site does make a ‘positive contribution’ to the conservation area, even if this has been harmed already by surrounding development. Therefore, positive planning would be mitigation of current harm through enhancement under NPPF 81, and Core Strategy Policy P11 – which specifically mentions the setting of public parks as a heritage asset that gives Leeds a distinctive identity. We suggest that on HG2-9 this would be from a role in biodiversity and providing water runoff into Yeadon Tarn to enhance the wild flower meadow and bog habitats of the Park’s Plan.

HG2-10 GILL LANE, YEADON

Aireborough Housing Target	2,300 Core Strategy	2,014 Current SAP Target
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HG2-10 Gill Lane, Yeadon – Green Belt	
Site Capacity	155 units. Has stayed the same despite a substantial buffer zone being one of the key changes – see pink area in the map 2 below.
Site Area	5.91 hectares, site size has not been reduced despite buffer zone
Development phase	2

Green Belt Assessment 2015	Leeds' Assessment 2015 – as at June 2016 . Changes to detail of Sustainability Assessment
Check the unrestricted sprawl of large built up areas	Low potential to lead to unrestricted sprawl
Prevent neighbouring towns from merging	No merging of settlement
Safeguard the countryside from encroachment	Site does not perform an important role in safeguarding from encroachment
Preserve the setting and special character of historic towns	No effect on the setting and special character of historic features. Marginal effect on the setting and special character could be mitigated against with appropriate detailed design
Overall Conclusion	Well contained site with strong connections to the urban area. Site performs well against the purposes of green belt.

Sustainability Assessment June 2016

http://www.leeds.gov.uk/SiteAllocationMaps/SAP_PreSubmission_Site_Assessments/Site%20Assessments%20Aireborough%20Housing.pdf



Map 1 – Original

http://www.leeds.gov.uk/SiteAllocationMaps/SAP_PreSubmission_Changes/02%20SAP%20Submission%20Draft%20Plan%20Aireborough.pdf page 61

CHANGE 73 - HERITAGE CHARACTER Amend Listed Building site requirement: The site is in the setting of a Listed Building. Any development should preserve the special architectural or historic interest of Listed Buildings and their setting, including through providing enhanced landscaping and planting along the southern site boundary. Further guidance on these requirements is provided in the Heritage Background Paper.

CHANGE 74 – HERITAGE CHARACTER Amend Conservation Area site requirement: Conservation Area: The site affects the setting of Nether Yeadon Conservation Area. Any development should preserve or enhance the character or appearance of the Conservation Area. The majority of development should be focussed on the western part of the site, with green space and sensitively designed lower density development in the east to maintain a sense of openness. Further guidance on these requirements is provided in the Heritage Background Paper.

http://www.leeds.gov.uk/SiteAllocationMaps/SAP_PreSubmission_Changes/G%20Heritage%20Background%20Paper%20Final%20Draft%20Jan%202017.pdf See page 48

The plan below illustrates views and the areas of higher sensitivity on the site;



Map 2 – Site with changes following historical assessment.

SEE POINTS FROM RESIDENTS' RESPONSE.

I do not believe the plan is sound:

1. This site was recommended to be included in the Nether Yeadon Conservation Area by Historic England (formerly English Heritage on 7th January 2014). The site was excluded because the Council wanted to maximise development density on the site. The council has not altered the housing numbers of this site despite the consistent feedback from Historic England and residents.
2. Despite acknowledging that they are required to avoid or reduce harm to the Conservation Area and enhance its assets, the Council confirm they do not have any plans to give sufficient measures to remove or reduce harm or to enhance heritage assets.
3. The plan proposes an access road (within the Conservation Area) leading out onto Gill Lane along an ancient track, adjacent to Low Hall (Grade 2 Listed Building). This track is a key part of the character of the Conservation Area and is a significant historic feature for the area. Allowing vehicular access along this track, tarmacking the surface and chopping down trees (with Tree Preservation Orders) is not acceptable and cannot be allowed. An alternative route is needed, taking vehicles away from the Conservation Area.

I do not believe this is legally compliant:

1. This site is greenbelt and meets the requirements of Greenbelt within the National Planning Policy Framework:
 - (i) To check the unrestricted sprawl of large built-up areas – development of this area would infill the last pasture land along the A65 from Rawdon to Menston. This area is needed to create a sense of openness in an already built up area.
 - (ii) To prevent neighbouring towns merging into one another – development of this area would merge surrounding areas together, Yeadon, Henshaw, Nether Yeadon and Westfield.
 - (iii) To assist in safeguarding the countryside from encroachment – these fields are connected though a

local rural estate as part of the Greenbelt corridor between Leeds and Bradford.

(iv) To preserve the setting and special character of historic towns – the proposed changes suggested by the council for 155 houses will destroy the character and appearance of the Conservation Area and Listed Buildings.

(v) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land – there are more suitable derelict sites around Leeds which can be used other than developing Greenbelt land which will also destroy the setting of a Conservation Area and Listed Buildings.

2. There has been no evidence of Leeds and Bradford Councils co-operation around Greenbelt and the impact of the extensive development from Bradford towards Leeds.

I do not believe this is justified or effective:

1. The Council have kept the house numbers at the original 155, despite marking over 60% of the area as “highly sensitive”. The area not marked as “highly sensitive” dominates the site (because of its elevated position), any building would overlook the Conservation Area and Listed Buildings. The whole site is therefore sensitive. This level of sensitivity means that the target of 155 houses cannot be justified and therefore this does not represent an effective site for provision of housing.

2. The Council have stated - to mitigate the impact of development on the area and the green space, there will be sensitively designed lower density development in the east of the site. This will maintain a sense of openness and there will be enhanced landscaping and planting along the southern site boundary. These are vague undertakings. There are no specifics as to what “lower density development” or “enhanced landscaping” actually mean.

3. HG2-10 consists of medieval pasture fields directly attached to the farm houses and manor house that used them. The pasture land contributes to the rural setting and village character; the openness of the site contributes to the rural setting and village character, and plays a part in the contextual understanding of the Conservation Area and Listed Buildings. Development here is not justified.

4. The character of the properties within the Conservation Area includes (locally sourced) natural stone houses, mullioned windows and stone slab roofs, positioned within a rural setting. The construction on this site will merge areas together which will mean the complete loss of the setting, this cannot be justified

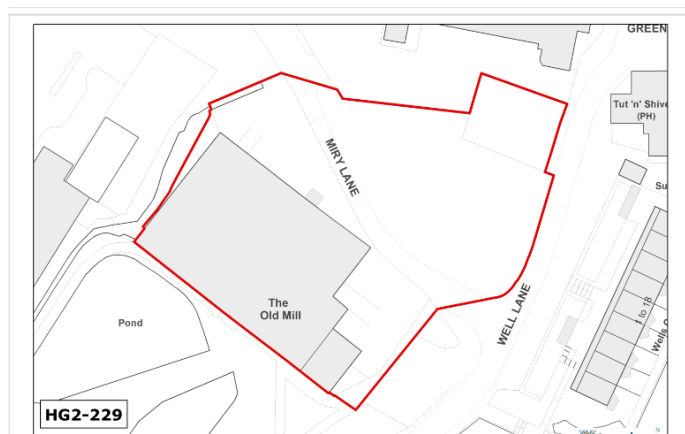
What would make the plan sound

This site should be retained as green belt and enhanced under NPPF 81 with a suitable use to be determined in the Neighbourhood Plan as part of the area’s green infrastructure. Whatever the use it, it should enhance the conservation area, and listed buildings.

HG2-229 THE OLD MILL, MIRY LANE YEADON.

Aireborough Housing Target	2,300 Core Strategy	2,014 Current SAP Target
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HG2-229 The Old Mill, Miry Lane Yeadon – New Site, Brownfield	
Site Capacity	15 units.
Site Area	0.43 hectares
Development phase	1



Map 1 – Proposed

http://www.leeds.gov.uk/SiteAllocationMaps/SAP_PreSubmission_Changes/02%20SAP%20Submission%20Draft%20Plan%20Aireborough.pdf page 67

CHANGE 58 and 72 - NEW SITE . New housing allocation, 0.4 ha, capacity 15, Phase 1 to be inserted - plan and site requirements:

Highways Access to Site site requirement: Improvement to Well Lane, including widening and provision of footway.

Culverts and Canalised Watercourses site requirement: The site contains a culvert or canalised watercourse. Development proposals should consider re-opening or restoration in accordance with saved UDP Policy N39B.

Older Persons/Independent Living site requirement: The site is suitable for older persons housing/independent living in accordance with Policy HG4.

Ecology site requirement: An ecological assessment of the site is required. Native tree and shrub planting within a Biodiversity Buffer (not to be transferred to private ownership) along north-west boundary (including beck) of site to compensate for loss of part of the Leeds Habitat Network.

Conservation Area site requirement: The site is within the Yeadon Conservation Area. Any development should preserve or enhance the character or appearance of the Conservation Area. An assessment of the significance of the existing buildings, and their contribution to the Conservation Area, should be undertaken to inform development on this site. Positive buildings should be retained and reused wherever possible as part of the development. Further guidance on these requirements is provided in the Heritage Background Paper

http://www.leeds.gov.uk/SiteAllocationMaps/SAP_PreSubmission_Changes/G%20Heritage%20Background%20Paper%20Final%20Draft%20Jan%202017.pdf See page 60

SEE POINTS FROM RESIDENTS' RESPONSE.

The current SAP plan for this site is not sound for the following reasons

This proposal is not positively planned as:

- Site HG2-229 is in the centre of a mixed retail and light industry area the Neighbourhood Plan strongly considers that a mixed use would be far more appropriate. Under the last UDP the area of Old Dog Mill is designated as a town and local centre. This has not changed in the draft Site Allocation Plan. Leeds Core Strategy Spatial Policy 2 points to the requirement for centres to have vitality and viability, and that retail, employment, leisure and cultural amenities will be directed to these locations. SP 2 also says that centres need to retain their 'local distinctiveness'. We therefore consider that this site should be planned in conjunction with the surrounding area for mixed use with full consideration of SP2 which is what the local Aireborough Neighbourhood Plan is doing. This is a far better plan for using the current positive buildings that contribute to the character of the area. This is supported by English Heritage, who in their comments of 22 Feb 2016 on planning application 15/06800/OT relating to this site, say "*We also question whether sole residential use is the best way of preserving and enhancing the contribution the building makes to the conservation area*"
- The SAP calls for an assessment of the significance of the buildings to the Conservation Area. It is not appropriate to add this site to the housing allocation in the manner that it has been until these assessments have been carried out. Spatial Policy 11, which calls for *local townscapes and their settings to be conserved and enhanced, especially those relating to nationally significant industrial heritage* is relevant here. The Old Dog Mill is one of the most important buildings of Yeadon's heritage. It dates from 1792 and was the first steam powered mill in the area, and is the focus of industrial action that is a key part of Yeadon history (P. Booth, The Old Dog Strike, (pub Otley & District Trades Council) P Macartney The Yeadon Lockout and Hunger marches of 1913 (191) <http://www.angelfire.com/ma/Socialworld/Yeadon.html>). The importance of the Old Dog Mill in Yeadon history is supported by English Heritage, who say in their comments of 22 Feb 2016 to planning application 15/06800/OT relating to this site "*The attributes of the mill which contribute to its significance include the landmark prominence of the tower in the valley, **the evidence the structure holds of the area's history and development**, the local vernacular style it exhibits and its importance in the streetscape [my emphasis]*" The Old Dog Mill is identified as a positive building in the Yeadon Conservation Area Appraisal.
- The SAP calls for an ecological assessment which is crucial to the planning of the area and the use of this site as it sits near to a Local Nature Area, and Wildlife Habitat Network, and also contains an important watercourse which feeds from Yeadon Tarn. In addition, the DOE surface water flooding map shows that there is a high risk of surface water flooding on parts of the site, so a suitable SUDS treatment, that is linked to the local ecology is vital

The following parts of the Plan are not justified

- The requirement for older persons/ Independent living is not justifiable. The site is separated from the local shops of Yeadon Town Centre, and from all three medical facilities, and Post Office, by a steep hill (known locally as The Steep). Access on foot or by mobility scooter would not be practicable for the residents of such accommodation. Aireborough is in need of accommodation for single and first time buyers, and the location of this site would be far more suitable for this type of accommodation – in a not dissimilar way to the way Leeds City Centre has developed.

The following parts of the Plan are not effective

- The improvement to access is not deliverable. Well Lane meets Kirk Lane on the inside of a bend, a blind corner with visibility being blocked by the Robin Hood public house. Kirk Lane is the main route between the centre of Yeadon and the A65; it carries continuous traffic travelling at the speed limit of 30mph. No plans are shown to explain how to mitigate this dangerous junction.

How can the plan be made sound?

Masterplan the whole of this lower area of Yeadon's town centre as part of the Neighbourhood Plan to enhance the heritage and character of the area. The area should be mixed used development to include housing for single people and young couples. It should also contain relevant community facilities, and link well with the local nature area ensuring the water course has a relevant SUDS treatment. The capacity of the site for housing may be greater or less than 15 units.

SAP CONSULTATION LETTER TEMPLATE

SAP Pre Submission Changes
Policy and Plans Group
The Leonardo Building
2 Rossington Street
Leeds LS2 8HD
Email: sap@leeds.gov.uk

Your address
Your email (optional)

Date of letter

Dear Sir

RE: LEEDS SITE ALLOCATION PLAN - PRE SUBMISSION CHANGES – FEBRUARY 2017

Site HGx – x. Give name of site eg Wills Gill, Guiseley, and also the number of the change

I consider the pre-submission changes on the above site to be Sound/Unsound (*delete sound if you disagree that the site is suitable for development, delete unsound if you agree the site is now suitable for development*).

The plan fails on the following tests of soundness for this site (*use if you consider the plan unsound, insert the points applicable from the list below*)

- Positively Planned (*have key aspects of needs, the area and the site, been properly assessed and that information used to inform the decision?*)
- Justified (*have all alternative sites been examined to meet the needs and evidence and the best option chosen?*)
- Effective (*is this site capable of being delivered effectively with right infrastructure, cost, and partners?*)
- Consistent (*is the use of the site and the plans for it consistent with planning regulations?*)

My reasons for saying this are as follows

1. Reason 1, give evidence for your view, including documents, policies, reports if known
2. Reason 2, give evidence for your view, including documents, policies, reports if known
3. And so on down your list

To make the Leeds Site Allocation Plan sound the Council needs to (*state any ideas you have for overcoming the issues listed above as making the plan unsound*)

REPEAT THE ABOVE FOR EACH SITE YOU WANT TO COMMENT ON

In addition, the Leeds Site Allocation Plan is still not legally compliant because it does not accord with the following legislation (*you can leave this section out if you do not know*) (*insert the point(s) from the list below*)

- Statement of Community Involvement
- Consultation of appropriate Statutory Bodies
- Duty to co-operate with neighboring Local Authorities eg Bradford
- Planning & Compulsory Purchase Act 2004(Planning process–Local Development Framework)
- Town and Country Planning Regulations 1990 (Development and use of land - NPPF)

- Leeds Sustainability Appraisal Report

My reasons for saying this are as follows

- 1. Reason 1, give evidence for your view, including documents, policies, reports if known*
- 2. Reason 2, give evidence for your view, including documents, policies, reports if known*

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

Sign and print your name