

# CONSULTATION ON CHANGES TO AIREBOROUGH'S SITE ALLOCATION PLAN



## Response PreSubmission Changes

March 2017

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Prepared by Jennifer Kirkby after consultation with the Aireborough Neighbourhood Development Forum and other Residents of Aireborough

The Forum would like to attend the Inspector's hearings on the Site Allocation Plan and be kept up to date with progress of the plan.

We reserve the right as a designated Neighbourhood Planning Body to add to our response when new, and pertinent evidence is available via the Neighbourhood Plan Process.

*Jennifer A Kirkby*

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## OVERVIEW TO CHANGES

- The Forum is pleased to see that **historical assessments** have now been done on the Aireborough Site Allocations, following comments from Historic England. It can be seen from this, that nearly every site allocation on green belt affects the historic character of the area; and in fact we believe that there is an historical assessment that should be done for site HG2-4 Hollins Hill, as it is the setting for 4 listed farms, as well as the Tranmere Park Conservation Area, and is also near a highly constrained area for green belt sustainability over on Bradford MDC's side of the border.
- We note that the historical assessments have changed **the green belt purpose reports**, and that other changes have been made to these strategic green belt sustainability assessments since the 2015 publication draft consultation. We have therefore made comment on these, as the issue of comprehensive green belt review and the sustainability of choices is one that was brought up in the Inspector's Core Strategy Report of September 2014, see below. We feel that this is highly relevant to the setting and permanence of Aireborough's green belt, which we do not think has been positively or justifiably done, and therefore is not sound.

*"As submitted the Core Strategy only commits the Council to a selective [green belt] review . This may lead to pressure to release land in the review area, when having regard to the advice in paragraph 85 of the NPPF , there is more sustainable land elsewhere. A Comprehensive review is also more likely to ensure consistency with the spatial strategy and increase the likelihood that boundaries will not need to be reviewed again at the end of the plan period. "*

- The Green Belt issue is especially pertinent to Aireborough as it is on the **border with Bradford**, who have also made green belt changes. It is not obvious how Leeds and Bradford have worked together and determined a strategic green belt in the area covering Leeds' Aireborough HMCA , Bradford's North East/ Shipley and Wharfedale areas. This particularly affects two potential sites, HG2-1 Birks Farm and HG2-4 Hollins Hill, which both sit on the border. At the time of comment the Bradford Core Strategy is on hold with DCLG owing to the amount of green belt required under exceptional circumstances in Wharfedale, which is literally the other side of our border.
- In addition to historical character, landscape too, play a profoundly important part in defining the character of Aireborough which *"occupies a highly distinctive transitional position on the Northern edge of the Leeds and Bradford conurbations"*. As there was limited published material on **what contributes to the sense of place that is Aireborough and how it gives rise to local uniqueness**, and landscape character was not included in the sustainability analysis, the Aireborough Neighbourhood Development Forum (ANDF) conducted a **landscape and ecology study** for the Neighbourhood Plan in 2016. We have mentioned these reports, where the findings have bearing on the changes – but there is yet more evidence in them to help with sustainable placemaking.
- At the end of 2016, the Forum started an **Urban Character Analysis** for the Neighbourhood Plan, after DCLG and AECOM confirmed it was a study that was required. Although this is not yet finished, again we have mentioned findings where they have a bearing on the changes. One of the key outputs from this study has been finding areas of the build environment which we have identified could be regenerated with higher density, or better planning of areas such as retail car parks. This is in line with the current Housing White Paper. These sites are particularly good for the type of housing the area needs ie smaller property for single people and young couples, and older retirement property.
- **We welcome the changes that have been made to the SAP however, the ANDF is still of the view that the plan is not sound on a number of points, including positive planning based on need and evidence, justifiable in accordance with alternatives, and effectiveness of delivery. We are taking steps to address these issues in the Aireborough Neighbourhood Plan.**

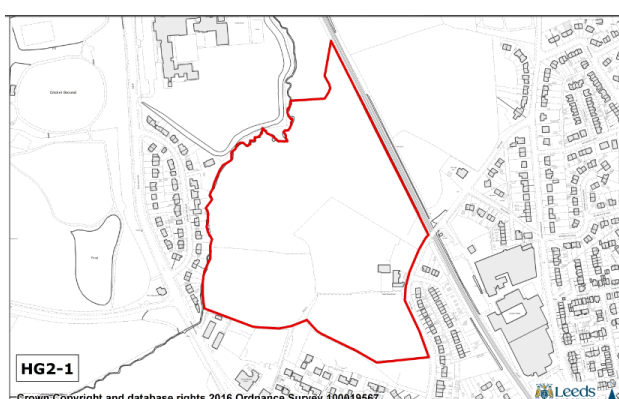
## HG2-1 NEW BIRKS FARM, INGS LANE GUISELEY

|                                   |                     |                          |
|-----------------------------------|---------------------|--------------------------|
| <b>Aireborough Housing Target</b> | 2,300 Core Strategy | 2,014 Current SAP Target |
|-----------------------------------|---------------------|--------------------------|

| <b>HG2-1 New Birks Farm, Ings Lane Guiseley – Green Belt</b> |  |
|--|--|
| Site Capacity  | reduced from 285 units to 160 units            |
| Site Area  | 10.84 hectares, site size has not been reduced |
| Development phase  | 2  |

| <b>Green Belt Assessment</b>   | <b>Leeds' Assessment 2015 – as at June 2016 .<br/>Changes to detail of Sustainability Assessment</b>  |
|--|---|
| <b>Check the unrestricted sprawl of large built up areas</b>   | Low potential to lead to unrestricted sprawl .  |
| <b>Prevent neighbouring towns from merging</b>   | No merging of settlements .   |
| Would development of the site lead to physical connection of 2 or more settlements                   | Yes. <b>Changed to No</b>   |
| Do natural features provide a good physical barrier to the site to ensure development is contained.  | No. <b>Changed to Yes</b>   |
| <b>Safeguard the countryside from encroachment</b>   | Site does not perform an important role in safeguarding from encroachment   |
| Does the site include areas of woodland, trees that are protected, or significant unprotected cover? | No. <b>Changed to Yes</b>   |
| Does the site include best grade agricultural land   | No. <b>Changed to Yes</b>   |
| <b>Preserve the setting and special character of historic towns</b>                                  | No effect on the setting and special character of historic features . <b>Marginal effect on the setting and special character could be mitigated against through appropriate detailed design.</b> |
| <b>Overall Conclusion</b>  | Site is well contained development would round of the settlement  |

Sustainability Assessment June 2016



Site Allocation Maps – PreSubmission Changes 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

**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."

#### **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 do not appear to have co-operated on a strategic green belt review across their boundaries. Leeds has only done site specific assessments. This is Bradford's **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>

#### **RESPONSE.**

**The Plan for this site is still unsound because:**

##### **It is not a positive plan based on needs**

- The historical assessment shows that the site does play a role in preserving openness of character, and therefore does play a part in safeguarding the countryside from encroachment. This should be added into the green belt purpose assessment, thus changing the overall conclusion on this factor.
- 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, and we disagree with the change in the green belt assessment. **There is no new boundary drawn for the extent of the housing now planned** nor a plan for the extent of the proposed 'Public Open Space' – would this stay as green belt? The SAP is 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 strategic, comprehensive review had been done.

##### **It is not justified based on the evidence**

- 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)
- 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](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 of this is highly unlikely to be enough to make the site sustainable given recent research done by Professor Rhodes on sites in Menston, just across the A65, showing that ground water levels in Environment Agency models are being underestimated by a factor of 10 in the Guiseley Gap. This has resulted in building sites in Menston being halted and running out of planning permission.

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

#### **It is not effective, there are issues with delivery especially with regard to the Bradford Plan**

- 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. Development planned for Menston (600 houses), Burley (700 houses), Ilkley (1,000 houses) will all impact on the A65. Not enough consideration is given to this.
- 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.

#### **Not legally compliant**

- **Town and Country Planning Act - NPPF.** The site still fulfils many aspects of green belt purpose

#### **WHAT MAKES THE PLAN SOUND**

- The ANDF in the Neighbourhood Plan, are of the view that New Birks Farm and its environs could be developed with a 'court-yard' of smaller properties, maybe with related workshops, which would save and enhance this positive building; bearing in mind issues from the historical assessment regarding design, material and views. This development could be 'green washed' without having to change the green belt boundary, which is a strong one (contrary to what is said in the green belt assessment), as there is already a farm building there. The Forum has started to look at proposed design plans for this area, so that they can be consulted on. This is an ideal site for a smaller developer to tackle with sensitivity, in regard to the landscape and ecology as well as the historic character.
- The rest of the Ings should be developed as a nature reserve, particularly as it contains a rare habitat for curlews to breed and overwinter. This species is in decline due to habitat loss. *James Pearce-Higgins, Journal Bird Conservation International, 1 March 2017*  
<http://www.birdguides.com/webzine/article.asp?a=6233#.WLqy92Fp2pQ.facebook>
- Issue revised documentation showing the extent of the proposed new housing boundary on site HG2-1 and the green belt boundary so that this can be properly consulted on alongside ANDF plans. .
- Carry out a strategic, comprehensive Green Belt review with Bradford Metropolitan District Council in Wharfedale/Aireborough.
- Consider the information in Professor Rhodes analysis on flooding and see if it will affect the site.
- Look at infrastructure plans for the Wharfedale/Aireborough with Bradford MDC

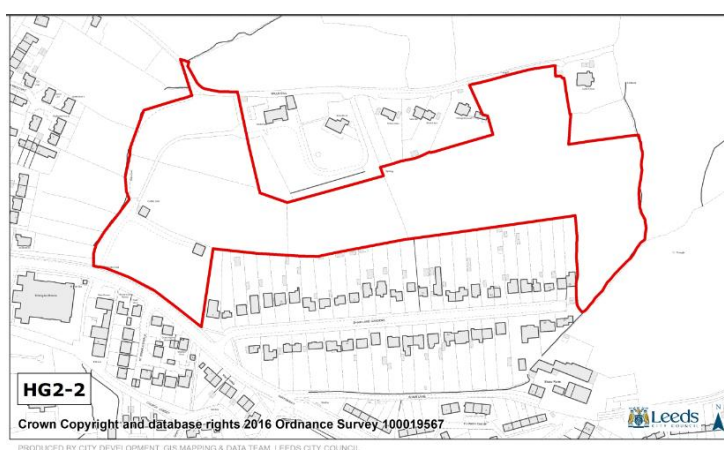
## HG2-2 WILLS GILL, GUISELEY

| 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 .<br>Changes to detail of Sustainability Assessment  |
|---|---|
| <b>Check the unrestricted sprawl of large built up areas</b>        | Low potential to lead to unrestricted sprawl  |
| Is the site well connected to the built up area.                    | Yes. <b>Changed to No</b>   |
| <b>Prevent neighbouring towns from merging</b>                      | No merging but there is no defensible boundary  |
| <b>Safeguard the countryside from encroachment</b>                  | Site does not perform an important role in safeguarding from encroachment   |
| Does the site contain buildings                                     | No. <b>Changed to Yes</b>   |
| Are they for agricultural purposes                                  | No. <b>Changed to Yes</b>   |
| <b>Preserve the setting and special character of historic towns</b> | Marginal effect on the setting and special character could be mitigated against through appropriate detailed design.  |
| <b>Overall Conclusion</b>   | 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

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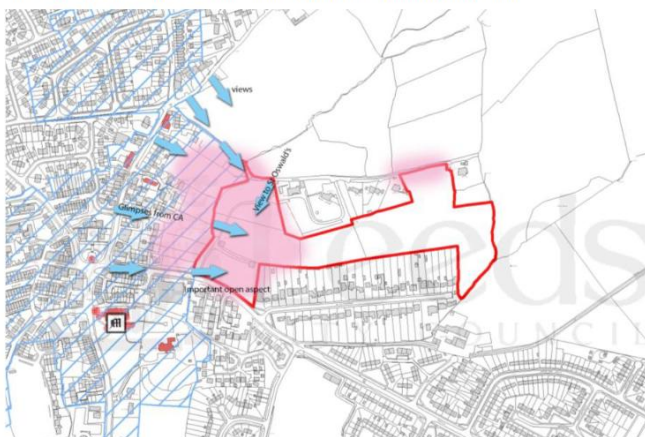


Map 1 – Original

Site Allocation Maps – PreSubmission Changes 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.

## RESPONSE.

**The Plan for this site is still unsound because:**

### **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 now 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.
- The plan still indicated that there should be highways access through the high sensitivity area linking to site HG2-3. A 'highway' combined with signage is an urban feature that would be of detriment to the conservation area, and impact on the open landscape setting, it would not be an enhancement, and so is not appropriate. The plans for this site have just not been thought through.
- If development is allowed to the east of the site it would be on the top of a hill. This would harm the views from the Conservation area and from the Church (a listed building). This too would erode the quality of the conservation area. Any screening would take away from the openness of the landscape and the sense of place.

### **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, and as Shaw Lane Gardens was originally allotments, we feel that provision could be made on the west of the site. The East of the site should be retained for grazing.
- 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

| 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 .<br>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, <b>but there is no defensible boundary</b>   |
| Safeguard the countryside from encroachment                                | Site does not perform an important role in safeguarding from encroachment   |
| Is there a strong, defensible boundary between the urban area and the site | Yes. <b>Changed to No</b>   |
| Does the site include best grade agricultural land                         | No. <b>Changed to Yes.</b>  |
| 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



Map 1 – Original

Site Allocation Maps – PreSubmission Changes 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 and improvement is likely as part of the transport assessment, which may require a contribution of land from the development site"

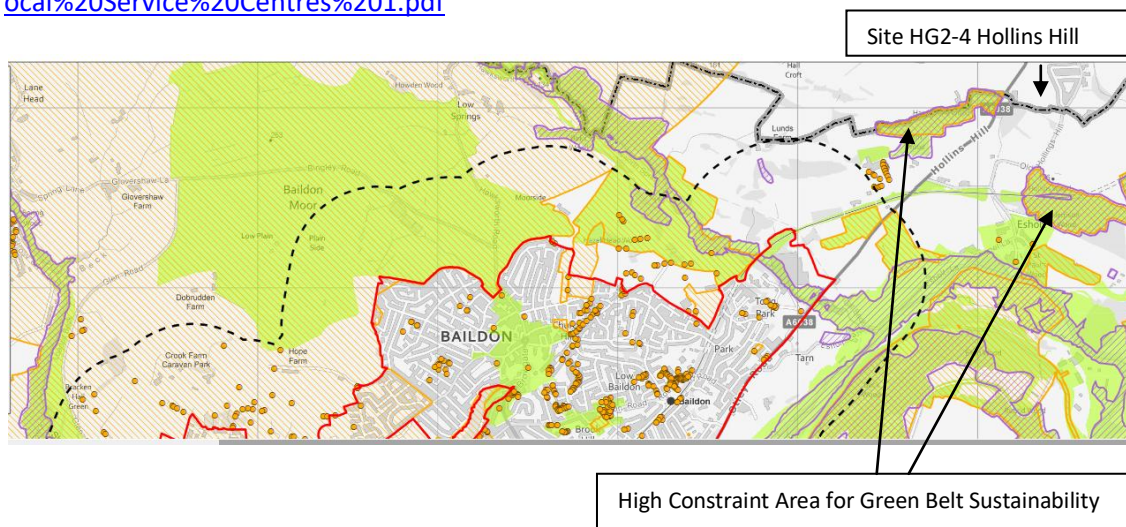
**MATERIAL CHANGE IN CIRCUMSTANCE SINCE 2015 – NOT NOTED IN LCC PAPERS** The Bradford Core Strategy has been approved by an Inspector in 2016, but since October 2016 has been on hold with the

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>



#### **RESPONSE.**

**The Plan for this site is still unsound because:**

#### **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.

- The site is part of a farm that grazes cows, there is a strong and defensible stone wall around it, therefore the green belt assessment on no defensible boundary is incorrect.

#### **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.

#### **Not legally compliant**

- **Town and Country Planning Act - NPPF.** The site still fulfils many aspects of green belt purpose

### **WHAT MAKES THE PLAN SOUND**

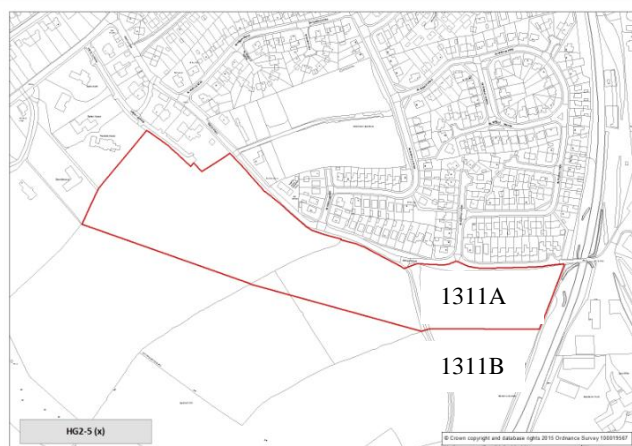
- This site is currently green belt farmland belonging to Hollins Hill Farm – the green belt assessment in the sustainability appraisal has now been changed to show that. It should retain this status as it makes the farm viable for cattle farming; removing the land makes the farm less viable. Post leaving the EU the viability of farms is going to be extremely important for their survival, therefore we should not be making them less viable in the SAP; this is not sustainable. Agricultural is still an industry in Aireborough; this means this industry needs supporting and enhancing for local employment especially when there is good quality grassland, as has now been acknowledged in the green belt appraisal.
- 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.
- 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

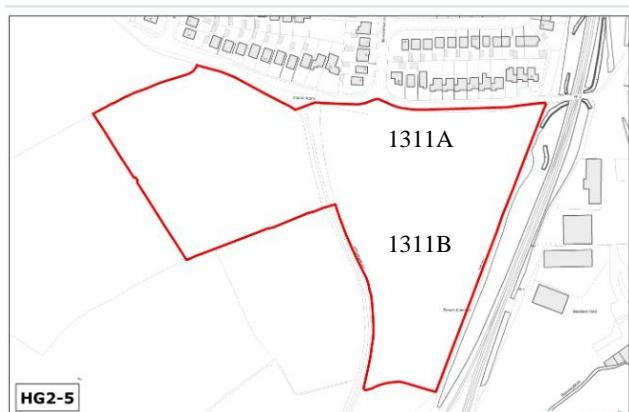
| HG2-5 Coach Road, Guiseley – Green Belt |   |
|---|---|
| Site Capacity                           | 83 units and a school, despite 23% reduction in hectares                    |
| Site Area                               | 4.14 hectares, area has changed significantly and reduced from 5.35hectares |
| Development phase                       | 2   |

| Green Belt Assessment  | Leeds' Assessment 2015 – as at June 2016 . <b>Changes to detail of Sustainability Assessment</b>  |
|--|---|
| 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 <b>Marginal effect on the setting and special character which could be mitigated against with appropriate design</b>  |
| Overall Conclusion   | Relates well to the urban area . <b>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.</b> |

Site Allocation Maps – PreSubmission Changes Sustainability Assessment June 2016



Map 1 Original site proposal 5.35 hectares



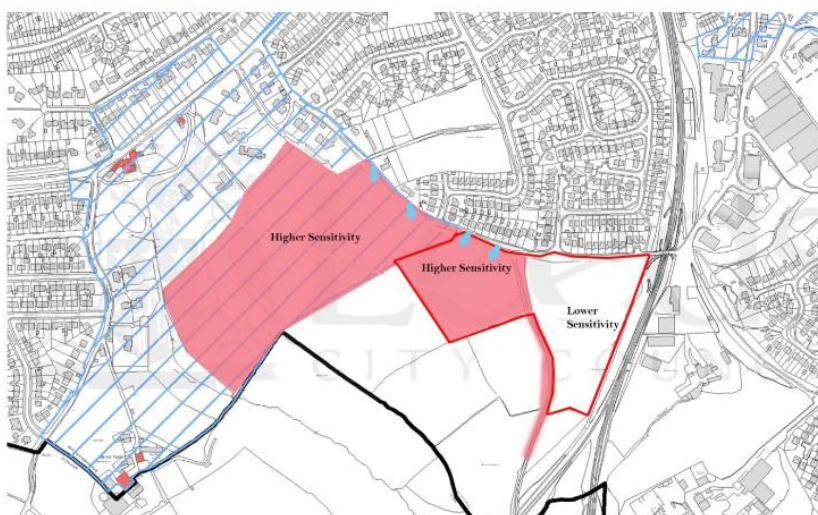
Map 2 New site proposals 4.14 hectares with old site assessment numbers. Site 1311 was originally split into part A and B

**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.

proposed revised boundary for the site,



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

Heritage Background Paper, Page 41

### RESPONSE.

The Plan for this site is still unsound because:

#### 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.   |

|   |   |
|---|---|
| <b>Safeguard the countryside from encroachment</b>                  | 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,  |
| <b>Preserve the setting and special character of historic towns</b> | No effect on the setting and special character of historic features   |
| <b>Overall Conclusion</b>   | 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. |

- Given the green belt assessments for the different sites along coach road, we strongly feel that the site still fulfils green belt purpose, as well as being special landscape.
- Site 1311B is by a railway junction, down a steep slope, surrounded by tall trees, and wet as water runs down the hill to the beck. It would not be a particularly pleasant or cost-effective place to live.

#### **Not justified**

- **Capacity and Alternative Brownfield Sites** – this site is deemed to have the capacity for 83 houses, yet the high sensitivity and mitigation is likely to lower than 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**

- **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, with so much of it being of high sensitivity to the conservation area. There has been no attempt to reduce capacity and thus alleviate some of the highway issues relating to access to Silverdale.

#### **Not legally compliant**

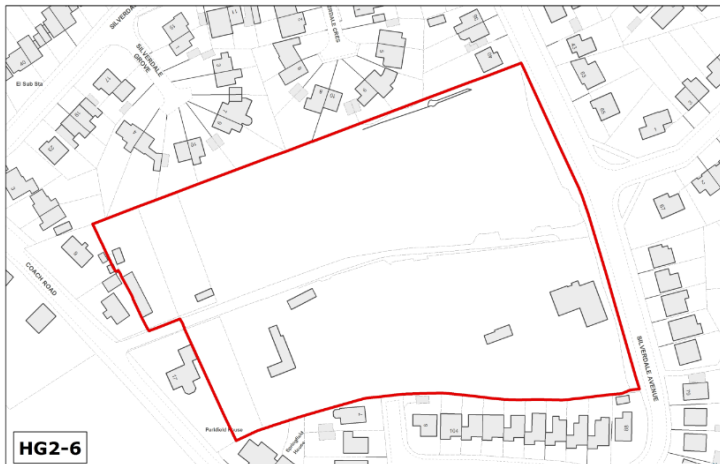
- **Town and Country Planning Act - NPPF.** The site still fulfils green belt purpose

### **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.
- 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.
- Under green belt enhanced NPPF 81 site 1311 could contribute to green infrastructure which is lacking on the Silverdale Estate – it may be possible to replace some of the lost allotments from site HG2-6. In the green belt assessment it clearly states that the land has agricultural value in category 1,2,3a, so ideally the rest of the site should stay as farmland, for farm viability, particularly as farming is an industry in Aireborough which should be supported and enhance. .

## HG2-6 SILVERDALE AVENUE ALLOTMENTS, GUISELEY

| HG2-6 Silverdale Avenue Allotments, Guiseley Greenfield |               |
|---|---------------|
| Site Capacity   | 32            |
| Site Area   | 1.98 hectares |
| Development phase                                       | 1             |



Map 1 Original site

Site Allocation Maps – PreSubmission Changes 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.'

### RESPONSE.

**The Plan for this site is still unsound because:**

- Key issues remain unaddressed; how an agreement will be achieved (currently x3 of the owners are refusing to sell) including access rights.
- There is a problem of flooding in neighbouring gardens which has been exacerbated by the removal of the trees & vegetation.
- 32 houses are far too dense for half 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.

### WHAT WOULD MAKE THE PLAN SOUND

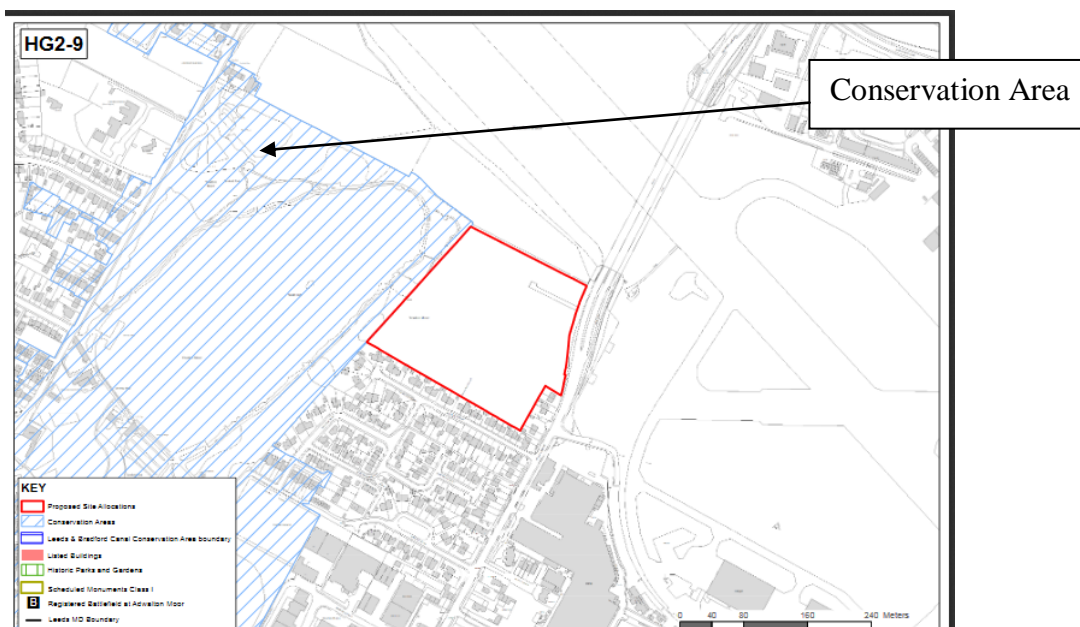
- A sound plan needs a discussion with the allotment holders and involvement of the Neighbourhood Plan to look at options. If the site is developed it should be one house per allotment, as per the original agreement for the allotment owners. This would then be a site suitable for self-build.
- The unit capacity for this site has been identified in the built environment, and for sustainability it may be better to leave this site as green infrastructure growing back the trees that are obviously controlling the flooding.
- It may be possible to provide some alternative allotments in site 1311A

## HG2-9 VICTORIA AVENUE YEADON

| 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 .<br>Changes to detail of Sustainability Assessment  |
|---|---|
| <b>Check the unrestricted sprawl of large built up areas</b>            | Low potential to lead to unrestricted sprawl  |
| Is the site well connected to the built up area                         | Yes. <b>Changed to No</b>   |
| Would development round off the settlement                              | Partial. <b>Changed to yes</b>  |
| Is there a barrier which if breached would lead to unrestricted sprawl. | Yes. <b>Changed to No</b>   |
| <b>Prevent neighbouring towns from merging</b>                          | No merging of settlement  |
| Are there features to contain the development                           | No. <b>Changed to Yes</b>   |
| <b>Safeguard the countryside from encroachment</b>                      | Site does not perform an important role in safeguarding from encroachment   |
| <b>Preserve the setting and special character of historic towns</b>     | No effect on the setting and special character of historic features. <b>Marginal effect on the setting and special character could be mitigated against with appropriate detailed design.</b> |
| <b>Overall Conclusion</b>   | Self contained between existing housing and airport runway. Development would constitute rounding off of settlement.  |

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Heritage Background Paper page 47

**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

## RESPONSE.

### **The Plan for this site is still unsound because:**

#### **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 gentle 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.

#### **Not legally compliant**

- **Town and Country Planning Act - NPPF.** The site still fulfils green belt purpose

## WHAT WOULD MAKE 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

| 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 .<br>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   |
| Do good boundaries mean development would be contained       | No. <b>Changed to yes</b>  |
| 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. <b>Marginal effect on the setting and special character could be mitigated against with appropriate detailed design</b> |
| Overall Conclusion   | Well contained site with strong connections to the urban area. Site performs well against the purposes of green belt.  |

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Map 1 – Original

Site Allocation Maps – PreSubmission Changes 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.

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



Map 2 – Site with changes following historical assessment.

### **RESPONSE.**

**The Plan for this site is still unsound because:**

#### **Not positively planned**

- 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 pre-industrial village character. Based on this the site was recommended to be included in the Nether Yeadon Conservation Area by Historic England; this is demonstrated by the large amount of highly sensitive land which has now been put back in the plan following the historic assessment. LCC decided to exclude the land from the Conservation Area because the site allocation plan was at the issues and options stage.
- 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, tarmacing the surface and chopping down trees (with Tree Preservation Orders) is not desirable. An alternative route is needed, taking vehicles away from the Conservation Area.

#### **Not effective**

- The Council have kept the house numbers at the original 155, despite marking over 60% of the area as “highly sensitive”. This number is therefore not deliverable.
- 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. However, the Council have stated - to mitigate the impact of development on the east there will be sensitively designed lower density development– it is not clear that this is achievable.

### **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. It is likely that it could become part of the Low Hall Estate again, which would enhance Nether Yeadon and the Listed Buildings.

## HG2-229 THE OLD MILL, MIRY LANE YEADON.

| 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

Site Allocation Maps – PreSubmission Changes 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

### 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 (1191) <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.

### **WHAT WOULD MAKE THE PLAN 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.

## **APPENDIX 1 – ORIGINAL SUBMISSION November 2015**