

Aireborough Neighbourhood Development Forum

Responses to Consultation on the proposed Main Modifications

Appendix 1 in response to MMs on sustainability and exceptional circumstances

HG2-1 New Birks Farm, Ings Lane

- A large part of the site is flood plain zone 3b. SP6 says areas of flood risk will be generally avoided; NPPF2 155 says areas at risk of flooding should be avoided. LCC commissioned a Flood Risk Report by Weetwood in June 2016 after the 2015 floods, at point 14 the report says:
"The Council's Flood Management Team believes that the Environment Agency and Leeds SFRA flood mapping significantly underestimates flood risk at the site and that it is likely that up to 75% of the site may actually be located within Flood Zone 3b, defined as land where water has to flow or be stored in times of flood (functioning flood plain) with the remaining 25% in Flood Zone 1."
- A key GB purpose of this site is separating the settlements of Guiseley and Menston – The last planning inspector to look at this site in detail for the UDP wrote in his report
"I regard the continued openness of this land as fulfilling above all the function of separating the two existing communities of Menston and Guiseley, and the contribution the site makes to the GB is so great as to override the need to identify land for immediate or possible longer term residential development" In their Appendix 1 SAP Summary of Representations for HMCA's LCC dismiss this conclusion by saying the planning context has changed and **there is now a need to allocate sites**. Firstly, this misses the point that the purpose of Green Belt **has not changed** and the boundary once established is meant to have some longevity. Secondly, it does not take the policies of the Core Strategy and the NPPF into consideration 'in the round'. Lastly, it ignores the statement by Community Minister Sajid Javid MP given at point A6 above.
- We consider that, as with the decision by the SoS in the Bagley Lane¹ appeal, that the substantial reduction in the size of this gap between Menston and Guiseley would cause adverse harm to the character of the area. Particular as it cuts across the Guiseley Gap valley and is highly visible from many landscape character vantage point around the area.
- It does not 'round off' the settlement as indicated in the GB assessment, it is urban sprawl. It protrudes from Guiseley towards Menston up the valley of the Guiseley Gap. This is especially since HG3-1 has been deleted from the SAP Allocations, and HG2-1 mitigations has to have a buffer next to Mire Beck on the floodplain zone 3b. . We therefore believe the allocation of this site contravenes Policy P12 of the Core Strategy which seeks to conserve and enhance the character, quality and biodiversity of the landscape

Check the unrestricted sprawl of large built up areas	ANDF View	LCC View
Would development of the site lead to/ constitute ribbon development YES/NO	Yes . It extends development up the Guiseley Gap Valley	No
Would development result in an isolated development site not connected to existing boundaries YES/NO	Partially	No
Is the site well connected to the built up area? – Does	No. Half a boundary with	Yes

¹ Bagley Lane, Farsley, Leeds. Application ref: 12/04046/ date Feb 2018

it have 2 or more boundaries with the existing built up area? YES/NO	Guiseley, the other half a railway line. Half with isolated area of Menston, the other GB school playing field. Half with woodland priority habitat, and half retail car park. 4 th GB.	
Would development of the site effectively 'round off' the settlement pattern YES/NO/PARTIAL	No, it protrudes from Guiseley towards Menston.	Yes. Classed as a major settlement extension.
Do natural and physical features (major road, river etc.) provide a good existing barrier between the existing urban area and undeveloped land, which if breached may set a precedent for unrestricted sprawl? YES/NO	Yes.	No . Assessment says boundaries well defined.
Conclusion	It is sprawl and will lead to more.	Low potential to lead to sprawl

- The allocation of this site is classed as a major urban extension (MUE). In CS 4.1.12 it says MUEs should preserve the distinctiveness of the settlements. This one does the opposite so is not in line with that or P12.
- 7 Feb 2019 BMDC passed an application for 133 houses at Bingley Road Menston 17/04591/MAF – this is not far from HG2-1 Ings Lane and the traffic from the Menston site will all spill on to the A65. This is a hugely controversial site that has been turned down in the past because of the flooding issues in the Guiseley Gap.
- This site has poor accessibility so is not in line with SP6i or policy T2
- It is in the 7km SPA/SCA zone for both the South and the North Pennines.
- It has one of the highest negative SA score for Aireborough and the highest GB purpose score .
- It lies in the Leeds Habitat network CS map 18 , and in a gap in the LCC strategic green infrastructure. Although not mentioned at SP13, the HRA assessment, policy G1, G9 and the lack of natural space in the Guiseley & Rawdon ward indicate that a far more sustainable use of this site would be as a wetland nature reserve. Especially as it is listed by the RSPB as a grassland assemblage for rare and declining farmland birds – including curlews, lapwings, grey partridge, red shank, and snipe. A small amount of development could take place around the old Farmhouse.

HG2-3 Wills Gill – MM27

- Modification 27 says that any development should preserve or enhance the character or appearance of the Guiseley Conservation Area and talks about the 'significant buffer' required to do this on the western side (see diagram); this is in line with P11 of the Core Strategy. However, the area of this significant buffer is the only place for an access road. Historic England have said in conversations and confirmed in an email dated 10 August 2017 that an urban road in the significant buffer would not be in line requirements, and in our view it would conflict with Core Strategy P11. Thus the infill part of the site has no means of access.

Historic England Email.

The conclusions and recommendations of the Heritage Impact Assessment not only recognise the importance of the medieval tofts and crofts to the character and appearance of the Conservation Area (very much reflecting the Conservation Area Appraisal) but also the importance of the land immediately to the east of these crofts (the western part of Site HG2-2). Indeed, the Heritage Impact Assessment makes it clear that it considers that the loss of the fields immediately to the east of the crofts would cause 'substantial harm' to the appreciation of the Conservation Area and the wider setting of this important medieval landscape.

Whilst there may be a site requirement for this site to be accessed direct from Queensway, this has to be achieved in a manner which also complies with the other requirements of the Local Plan Policy insofar as they relate to the historic environment - one of which is that it should accord with the advice in the Heritage Impact Assessment (which has made it quite clear the degree of harm that development on the westernmost fields might cause to the significance of the Conservation Area). With the removal of a possible connection from Site HG2-3, there appears to be, therefore, somewhat of an internal tension within the Policy.

Obviously, it will be necessary for any developer to demonstrate that the creation of an access road to the site from Queensway is compatible with the Local Plan requirements regarding the Conservation Area. If such a road cannot be created without causing harm, then, in line with the advice in the NPPF, in order to develop this site it would be necessary to demonstrate that this development would provide sufficient public benefits that outweigh the harm.

- There are no exceptional circumstances for this site, as the HMCA target up to 2023 has been over estimated by a capacity of 131.
- There is no permanent GB boundary to the east of the site, the boundary to the north seems to go around garden fences and hedges, and the boundary to the east is the building line, which leaves the medieval crofts still in the GB. In essence the site will have GB on 3 sides. .
- Together with HG2-3 this site was originally a major urban extension. However with the deletion of HG2-3 the useable part of the site is a protrusion from the urban area. Moreover, it is an invitation to future urban sprawl on the next door site HG2-3 Shaw Lane/Banksfield. Indeed, developers asked at the SAP Hearings if the road on site HG2-3 could be left so that HG2-3 could be developed later.

Check the unrestricted sprawl of large built up areas	ANDF View	LCC View
Would development of the site lead to/ constitute ribbon development YES/NO	No	No
Would development result in an isolated development site not connected to existing boundaries YES/NO	Partial	No
Is the site well connected to the built up area? – Does it have 2 or more boundaries with the existing built up area? YES/NO	No. Only one boundary.	No
Would development of the site effectively 'round off' the settlement pattern YES/NO/PARTIAL	No, it protrudes from Guiseley, with Green Belt on 3 sites.	Partial. Major Urban extension
Do natural and physical features (major road, river etc.) provide a good existing barrier between the existing urban area and undeveloped land, which if breached may set a precedent for unrestricted sprawl? YES/NO	Yes , a long old stone wall at the back of Shaw Lane Gardens and Queensway.	No. Partial well defined boundaries
Conclusion	It is sprawl and has High potential to lead to more	Low potential to lead to sprawl

- The site is in the 7km zone for the South Pennines SPA/SCA
- This site has accessibility issues on to Queensway especially as no longer connected to HG2-3. See statement from LCC highways in sustainability assessment. Mitigation on Queensway is suggested as traffic calming. Queensway has traffic calming already, it was recently changed as the old system was causing congestion, air pollution and accidents.
- The Aireborough ANDF Landscape Report lists this area as a tension point where landscape distinctiveness can be significantly harmed.
- Aireborough has a shortage of allotments and there is relatively little land available for new ones. The area to the south of this site used to be Shaw Lane Allotments, and the area to the east is a Farm. Thus we would suggest land on this site is allocated for new allotments to address the shortage in Guiseley and Rawdon ward that has been identified.

HG2- 4 Hollins Hill –

- This site is part of the Leeds Strategic Green Infrastructure and is thus affected by the assessment of the HRA and modifications, see maps in the HRA and Core Strategy. When policy G1 is talking about taking the opportunity to expand SGI, the allocation of this site takes SGI away in an area that is in the 7km SPA/SCA protection zone and in a ward that is short of natural green space with none allocated to make up the deficiency.
- The site is important to the Tranmere Park Conservation Area and the setting for surrounding listed buildings' but **it has not had a heritage assessment** and is in danger of conflict with Core Strategy P11. . Historic England say in an email dated 10 August 2018

Given the proximity of the Conservation Area and Listed Building, for consistency with its approach adopted elsewhere, in retrospect, there perhaps ought to have been a Heritage Impact Assessment produced for this site.

- There are no exceptional circumstances for this site in the Aireborough target, see table above.
- The Aireborough ANDF Landscape Report lists this area as a tension point where landscape distinctiveness is in significant danger of being harmed.
- This site has poor accessibility so is not in line with SP6i or policy T2. It will need a highway treatment for entry next to a busy traffic light junction.
- The site is the top of Hollins Hill and houses on the site will tower above the gardens on Hawkstone Avenue. Residents of new build will have the ground floor windows looking into upstairs windows of the older properties. Current houses would be completely overpowered!
- Are 80 houses on this site really a Major Urban Extension, or urban sprawl, particularly given the landscape tension point identified? Major extensions are supposed to avoid special landscape, which is the designation of this site. (CS 4.6.17)

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Would development of the site effectively 'round off' the settlement pattern YES/NO/PARTIAL	No, it protrudes from Guiseley	No. Major Urban Extension
Do natural and physical features (major road, river etc.) provide a good existing barrier between the existing urban area and undeveloped land, which if breached may set a precedent for unrestricted sprawl?	Yes , stone walls around 3 sides a footpath/hedgerow on the 4 th .	No. Partially well defined boundaries .
	It is sprawl.	High potential to lead to sprawl was later changed to low potential.

- This site should remain as strategic infrastructure with its role as part of a working farm (one of the listed buildings). The SA score should score a minus point on objective SA1 as employment will be lost if the site is allocated.

HG2- 9Victoria Avenue – MM30

- Main Modification 30 puts in extra mitigation for aircraft noise. However, aircraft noise cannot be mitigated for in gardens or in summer when windows need to be open for air. This site is right next to the Leeds Bradford Airport runway, and also next to a busy road, that potentially could become a junction for the new Airport Link Road. The pollution in this area should thus score more highly in the SA objectives.
- There are issues with access on to this site from the A658 given the tunnel under the runway and the potential of the junction with the Airport Link Road. A new consultation on the Link Road started on 18 February 2019. https://www.yourvoice.westyorks-ca.gov.uk/airport?utm_source=leedsgov&utm_medium=website&utm_campaign=connectinglba phase1
- There are no exceptional circumstances for this site in the Aireborough targets as the non-GB identified sites have been underestimated by 103 units.
- This site is right next to Tarnfield Park and with its particular nature should be used to enhance the Park and address the natural area deficiency in the area – particularly in the light of the HRA Assessment for the South Pennines SPA/SCA. Also, a natural area with relevant planting could offset pollution.