

Aireborough Neighbourhood Forum's Comments on the Soundness Of Leeds Core Strategy Development Plan Document (DPD)

General Summary

Our comments on soundness primarily concern the effect of DPD proposals on the area described as Aireborough (Guiseley, Yeadon, Hawksworth and High Royds) Rawdon is also in Aireborough but is now covered by its own parish council. Our comments concern the following areas:

Green belt/ infrastructure – The ANF welcomes the Leeds policy to enhance the value of a wide network of multi-functional Green Infrastructure to improve quality of life for residents and act as a strong incentive for attracting new business to the area. However, the DPD permits the elimination of a large area of green space from the environmentally sensitive Chevin area. This area is important for two reasons; firstly the proposed inclusion of part of the Chevin Ridge & Slopes into the potential South Pennines National Park; secondly as green infrastructure in an area that has few public parks in the built environment. This policy does not appear consistent with landscape assessments for the area which requires a 'resistance to suburbanisation'. We are particularly concerned with the lack of habitat survey on this area.

Housing projections - housing projections are not based on 2011 census figures, and do not appear to be based on objective identified local need – rather they appear to be aspirational. Given the approx 11% population increase of Guiseley between 2001-2011, compared to 5% in Leeds overall, and the now chronic state of infrastructure overload, aspirational targets are not justified, and the effects of cumulative development need to be more soundly examined. Aireborough does have particular need for very affordable and retirement homes – the affordable property built on recent Aireborough developments has not been affordable enough for local people.

Traffic congestion – The ANF welcomes the policy that transport (private, public, and human powered) should be included in plans for the sustainability of new development. And that, consistent with the ambitions to be 'the best city in the UK', Leeds will be better connected, by an accessible and integrated transport system, which supports communities and economic competitiveness. However, the A65 has been reportedly over capacity since 2005, and with further large development all along its route, the situation has deteriorated further (source:2011, WARD A65 Travel Report, Met Engineering). The effect of the housing proposed by both Leeds and neighbouring authorities on the A65 corridor, with little increase in employment, does not appear to have been taken into account in the DPD. We also question the strength of the co-operation between the Leeds and Bradford DPD's, given Bradford's plans for housing along the same A65 corridor.

Employment – The ANF is pleased with the part Aireborough is playing in the successful Leeds economy, as it has a wealth of skilled people and increasing innovative, creative and entrepreneurial businesses. It welcomes the policy to give equal chances to access jobs and training opportunities through the growth of local businesses. However, the DPD strategy, gives little regard to employment and business needs in Aireborough. With the airport, growing international businesses, and an increased population, Aireborough should justifiably be included as an area for job and business growth. This is backed by a quote from Arup 2012 economic study of LBIA " *The airport is a significant local employer as well as channel for inward investment and export led growth across high value goods and services, students and tourism. Currently the airport supports up to 2,800 direct jobs and generates*

gross value added (GVA) of £102.6 million in direct value. It also acts as the catalyst to a further 320 jobs and £10.8 million of GVA. In total therefore, the airport contribution to the economy is over 3,000 jobs and £113 million of GVA.”

Place making (services & facilities) – The ANF welcomes the policy that Town and local centres will remain at the heart of their communities and provide a good range of shopping, services and local facilities. However, the DPD lacks any stated intention to put in place infrastructure development such as improved health, education or the social, cultural and leisure facilities needed for a growing population. In fact we understand that there is no infrastructure delivery plan for the core strategy – which is an issue given the infrastructure needs of Aireborough. The already rapid population rise and retrenchment of some services and facilities back to Leeds centre eg credit unions, means that Aireborough’s facilities are decreasing, both literally and in proportion to its rising population. In addition, people in deprived areas of Aireborough are suffering a cost of travel disadvantage to access services they need. Local housing developments such as High Royds promised to provide community facilities and services – but this has not happened, leaving a cumulative development backlog. The DPD does not appear to recognize this situation and its effects on social and cultural wellbeing for all.

Positive vision for the future of Aireborough – this is not set out in the DPD, which ignores the effect of disproportionately large new housing estates on the character of the ancient townships and landscape, and on local need and wellbeing. It also missed the opportunity to create a vigorous local economy, as part of the economic international diversity of the city based on the opportunity provided by the airport and the innovative and creative skills in the area.

In short, where local neighbourhood planning evidence visions a vibrant and creative local economy, in the character habit landscape of the proposed South Pennines National Park, the Leeds DPD strategy sees a future as an urban dormitory. An urban dormitory is not sustainable given local needs and the effect of cumulative development. The Aireborough Neighbourhood Plan would wish to work a lot more closely with Leeds planners to really take advantage of the economic social and environmental opportunities the area holds – the only area of Leeds potentially to be included in the new South Pennines National Park proposals. We do not believe, based on our emerging evidence, that this has been done sufficiently yet, and welcome the policy that “an integral part of this [the Leeds] ‘vision’ is that local communities will be fully engaged with the need to bring about the sustainable growth of the city and to help the Council to manage investment in a way that delivers tangible community benefits.

Please find detailed comments below.

Detailed discussion and references, showing instances where in our opinion, the ‘tests of soundness’ have been failed.

Section 2 - The Core Strategy (DPD) was written primarily from the point of view of Leeds City rather than the Metropolitan District as a whole and the Settlements across the District receiving only a brief mention in part of 2.5. This is unchanged in the revision and there also remains a lack of clarity at times in the DPD, as to which Leeds, the City or the District is being referred to. It is **NOT POSITIVELY PREPARED** away from the city.

2.28 – the precision shown by the un-amended forecast growth figures is unattainable and the 2011 census data has not been used in the revision. The growth figures are **NOT JUSTIFIED**.

2.39 – inconsistent with large housing developments and ignores the network of PROW and Bridle Ways and their potential to link the Leeds Country Way with the Ebor and Dales Way long distance footpaths. **NOT POSITIVELY PREPARED**.

2.42 – Bullet points 3& 5 ignored for Aireborough – **NOT EFFECTIVE**

Section 3 (3.2 Spatial Vision) – Large scale developments on Aireborough’s remaining Greenfield is not compatible with **Bullet Points 3, 4 & 9** or with **Objectives (3.3) 15, 16 18, 21, 23 24** and **Spatial Policy 2 in Section 4**. The proposed new housing will inevitably change the character of the townships. Proposed developments for Aireborough are **INCONSISTENT WITH NATIONAL POLICY** as well as local policy, because of the huge number of dwellings designated for Greenspace and away from employment. To put the 2300 homes proposed for Aireborough into perspective, the contested 657 home Persimmon Homes development at Fulford, York, which was described by the Yorkshire Post on Sat 16th Feb 2013 as one of Yorkshires largest housing schemes, is tiny in comparison..

Section 4 – 4.1.1 amended – The huge size of this development will not improve public health or job growth, place making and the environment, as described in this amendment, are **NOT EFFECTIVELY SUPPORTED**. **Place Making (see also 3.3(iii) and 5.3)** is important for communities (see Section 5), but it is the sheer size of this development that is destructive. It is therefore not compliant with Leeds Spatial Development Strategy.

We note also that in **4.1.3** the authors say they expect ‘The level of housing growth expected to occur within Leeds by 2028 is greater than for any other authority within England’. We wonder on what basis this claim is made - could it not be the case that increasing the growth for Leeds from the national average of 4% to a massive 14% is overdone. It should also be noted that if the Officers are correct and the land is not built on now, it will still be available for development as 2028 approaches - assuming other authorities stand aside and leave growth to Leeds, as the national birth rate continues to decline. Development of the size proposed is, we would suggest, **NOT ECONOMICALLY JUSTIFIED**.

4.1.12 – Aireborough is listed as a Major Settlement, but the DPD and its revision do not contain any mention of the development of its local employment and services, the whole emphasis is on housing. To comply with Spatial Policy 1 (i) and to ‘obtain an appropriate balance’ across the whole District, since Aireborough has no remaining brownfield sites, those of other areas should be used before any of Aireborough’s Greenspace is taken in order to comply with Spatial Policy 6. **NOT EFFECTIVE**.

Spatial Policy 1 (vii) – Location – this has not been amended in spite of new information regarding the proposed **South Pennine Moors National Park**. This is now expected to include the Chevin as well as Hawksworth Moor, so there needs to be a complete ban on the development of the Chevin slopes, a highly visible environmental amenity area, until the National Park proposals are finalised. Large-scale development on the Chevin Flanks is therefore **INCONSISTENT WITH NATIONAL POLICY**.

Section 4.6.1 – Repeats the unjustified over-precision and refers to the delivery of sustainable development, promoting regeneration and job growth etc. These are aims that the housing allocation proposals fail to meet, reinforcing our assertion that the housing proposals are **UNJUSTIFIED**. This area has also suffered from the failure of Leeds Council to enforce the community benefits promised by the developers of High Royds and other sites. There is still no new school or doctor's surgery and traffic lights for the Park Rd/Bradford Rd junction seem to have been abandoned.

4.6.2 - Development on Greenfield sites fails the **Housing Growth Principles (i) to (v) and points (ii), (iii) and (vi) of Spatial Policy 6 – UNJUSTIFIED.**

4.6.13 - 66 000 new units does not fit with Leeds own estimated population increase by 2018 of about 105 000 and this is an unusually large 14% - see 4.1.3 - when the Office of National Statistics official growth estimate for the UK is only 4% and when unlike Leeds, the ONS correctly uses the 2011 Census The ONS also give the average occupants per dwelling for England and Wales as 2.4 people. Using this National Standard, even the unusually large population increase of 105,000 projected by Leeds would require only 43 750 new homes - not 66 000. The reduction is hugely significant for our Greenspace and because population growth is also quite possibly overestimated, there should be an even greater reduction in the number of new homes required, certainly in the short term until trends can be more accurately forecast. The housing projections in the Leeds DPD are disastrous for the environment and we do not understand why figures that appear to be both inaccurate and exaggerated have been used. The housing projections are **NOT JUSTIFIED.**

4.6.18 – Table 3 in Spatial Policy 7 is also a concern, it has not been amended and is still based on figures that are both dubious - 3% of 66 000 is 1980, not 2300 and this casual addition of an extra 300 houses on an already over-large total for Aireborough is equal to the total of the houses currently being built on the Crompton Parkinson's and Moon's Fields sites on Netherfield Rd. Developments that have already stretched the infrastructure to breaking point before they are complete.

4.7.4 – Promoting a strong local economy – we are concerned that the authors fail to recognise the need for employment in the major settlements in order to reduce the need for residents to travel. In spite of the presence of the Airport, the **Key Diagram 4.11.1** reveals no Strategic Locations for Job Growth north of the Leeds Outer Ring Road. The consequent increase in carbon emissions generated by thousands of new residents, all already employed outside Aireborough and other settlements, is clearly **AGAINST NATIONAL POLICY** because of the increase in the Carbon Footprint.

4.9 – Transport – Aireborough is one of the settlements particularly affected by excessive traffic along the A65 Corridor and Metro admit the trains are already full to capacity at peak times and the proposed new stations will not reduce peak period traffic along the A65 as both Apperley Bridge and Kirkstall are expected to service new housing developments and no station is proposed for the Clariant Site at Horsforth.

Problems on this important radial access corridor to Leeds – corridor because traffic currently spills onto adjacent minor roads to try and avoid delays - are compounded by developments in Wharfedale by the neighbouring Bradford MD and parts of North Yorkshire. Unfortunately **WYLTP3**, produced by Metro and the Regional Authorities has no answers for this and the congestion is likely to build as developments are permitted along this critical corridor to the detriment of the regions economy, as stated by Metro in WYLTP3. The **Quality Bus Scheme** makes things more difficult for private and commercial vehicles and is of little benefit to the outer settlements. The housing developments are therefore **UNJUSTIFIED.**

Section 5 - 5.2.8 – Housing Density - from observation of recent developments, Policy H3 is not being applied and within our 'fringe urban area' developments appear to exceed 35 dwellings per hectare. This over-development when on previously Greenfields will have an affect on surface water drainage and will contribute to increased flood risk in the City as well as affecting the character of our towns. It will also increase the demand for Leisure amenities such as Allotment gardens and Public Parks and before building is to take place, such amenity

areas should be designated and protected, otherwise developments **CANNOT BE FORWARD LOOKING.**

5.2.11 & Policy H5 – Affordable housing – residents whose earnings are in the lowest quartile and ductile cannot afford to purchase ‘affordable’ housing in Aireborough and this policy clearly requires tailoring to local needs. As it stands it is **NOT EFFECTIVE.**

5.3 – Place Making – (see also **4.1.1 and 3.3(iii)**) – this section still has some confusion between the City and the District and although subjected to major amendment, 5.3 is still largely retail oriented and largely fails to address the aims of Place Making as set out in 3.3, that is planning for community infrastructure and positive use of the historic environment. Place Making as presented is largely based on past evidence and fails to present future requirement for a rapidly increasing population. The population of Guiseley for example has increased by 11% in recent years and this it proposed to add a further 14%. Also in Guiseley, the important local centre of White Cross has been ignored. Large increases in population put a huge strain on the community infrastructure including education, health, public transport and social activities including entertainment and leisure, but the DPD diminishes leisure opportunities by removing vital Greenspace.

In practice, although **P3(i) and P4** now talk about considering the ‘cumulative impact of such development’, our local facilities are now at capacity there is gridlock on the A65 at weekends. **5.3.40 and Policy P9** need to be in place **BEFORE** development and not after and without the forward planning needed to create a vital community, this Section is **NOT POSITIVELY PREPARED.**

Policy P11 – Conservation – some conservation areas have been established in Aireborough, but recognition of the Green Context is also very important in a hilly district. It is vital that urban sprawl is prevented from covering the visible landscape and amenity areas on the higher ground surrounding the towns and green gaps between communities are vital to avoid unrestricted urban sprawl. Green issues are particularly important pending the creation of the South Pennines National Park, when our hills will be the only part of Leeds District to be included and it is critical that the Planners do not ignore the un-amended Policy P12.

5.5 – Managing Environmental Resources and Green Infrastructure – the Green Infrastructure has been ignored for the whole of the currently green area bounded by Guiseley, Yeadon, Cookridge & Bramhope on new **Map 15 (old 14)**. The clear links between this large green area and The Chevin ridge, Rombold’s Moor and woodland and open spaces in the Aire Valley have been deliberately ignored and this has been carried through into Habitat Mapping (Map 17) and other maps that show Greenspace.

This leads to the inescapable conclusion that the Officers have already decided to sacrifice this part of the District’s Green Infrastructure to developers before any local consultations have taken place. Planning in this way without any local involvement is **AGAINST NATIONAL POLICY** and is a major disappointment. It is also against Leeds own policies on Greenspace, including **Policy G4** and it is worth noting that in the Aireborough area, only the Chevin Country Park meets current Greenflag standards.

5.5.1 & Policy G1 – the enhancement of Green Infrastructure must not be ignored.

Policy G8 – Protection of Important Species and Habitats – without the completion of the **Habitat Survey**, it is impossible to know if any protected species are at risk through the Housing Proposals eg Diepker Woods and Yeadon Banks.. Proceeding without the Survey is **AGAINST NATIONAL POLICY.**

Policy EN5 – Managing Flood Risk – the Chevin area is a huge sponge and currently absorbs large amounts of rainwater it then releases slowly via the districts many springs, 90% of which drain into the River Aire up-stream of Leeds. Allowing urban sprawl to cover the Chevin slopes with houses & roads, particularly at the densities currently being used in Guiseley, will increase rapid surface water run-off into the River Aire and will increase he risk of City Centre flooding. This is **AGAINST NATIONAL POLICY.**

Section 6 - Policy ID1 – unofficially pre-planning of the removal of Greenspace by ignoring it on the Maps and by failing to include it in the Habitat survey, is clearly against the amended

Policy ID1, Bullet Point 2, because it precludes working with Communities including through Neighbourhood Planning. It is also not in accordance with the Planning Obligations and the **NPPF referred to in 6.31** and is therefore **AGAINST NATIONAL POLICY**.

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