

## **Comments on the Leeds Local Plan 2025**

### **Submitted on behalf of the Adel Neighbourhood Forum**

14 September 2025

#### **Demand**

We have found it difficult to understand the detailed process by which housing demand has been estimated, particularly when housing need is broken down by area (eg Outer North West). It seems to depend in part on a survey of a subset of residents from across the city but this leads to a measure of housing preference rather than need.

For most people working in or near the city centre, their need is to live in Leeds. They may have a preference to live in a particular area but there is no intrinsic advantage to one part of the city over another. Where there is significant employment in an area then that may lead to a particular need for people working there to live close by, but this is not a major factor for Adel.

People moving or downsizing would generally benefit from remaining close to their existing support networks, but these moves do not increase the overall housing demand for an area.

If housing targets are to be applied to the major sub-areas within Leeds then the process to determine the allocation needs to be fair and transparent. We have been told that there are no targets for individual areas at this stage. If targets are brought in then we would expect full consultation before any figures are finalised so that residents can comment on the methodology and be reassured that the distribution is equitable.

#### **Comments about the 2042 site allocation process**

We will start by making general observations about the process and methodology adopted before going on to make specific comments about the potential sites in our area. We appreciate that a great deal of work has obviously been put into the initial assessments of the sites; any criticism which follows is intended to be constructive.

On a matter of timing, we understand that there will be a further consultation on the next stage of the process which is expected to take place in around a year's time. In our view this should be held outside the major school holiday period (eg starting in mid-September). Although the duration of the consultation allows for individuals who may be away for an extended period to respond in relation to individual sites, for a group such as ours the holiday period makes it harder to collaborate effectively (when different people are away at different times) and makes it harder for us to liaise with residents (difficult to pick a time for a residents' meeting when a significant proportion of people (including members of the Steering Group) aren't away).

## **Apparent Lack of Strategic Approach**

The question of brownfield sites being built out first is obviously a key issue. From our conversation with Martin Elliot at the drop in session at Moortown Library it was clear that a lot of work has gone into identifying brownfield sites in central Leeds and attempting to ensure they get developed. We are not aware (except as mentioned below) of any brownfield sites in Adel.

Outside the centre of the city, there is less evidence of any strategic approach. Settlement boundary assessments for individual sites have been carried out against the existing boundaries but these are stated to be subject to change and 'locations for development' are still to be determined. On this basis it is hard for us to make sensible comments when the foundations haven't been finalised.

We would have expected a more proactive approach: careful consideration of the shape and needs of the city as a whole and suggested revisions to green belt boundaries being put forward by planning officials within which some development sites might be acceptable whilst maintaining the greenbelt objective of avoiding or minimising urban sprawl. This would clearly be a complex exercise involving consideration of landscape, infrastructure and many other factors. We assume this more extensive exercise is what is being planned but residents should be consulted on the outcome given the importance to the whole process.

If green belt must be used, has any thought been given to the creation of new settlements within the greenbelt? Proximity to rail or major road networks would be essential as would the immediate provision of infrastructure such as schools, medical centres, shops and community meeting places. Given the cost of these resources, the new settlements would require a critical mass such that infrastructure costs could be borne substantially by the developer. This approach might obviate the need for every community in Leeds to have a new-build eyesore tacked on to its edge with little thought given to availability of school places, medical facilities or realistic highway capacity.

The site(s) for any such new community would need to be put forward by the council to achieve optimum location, rather than just as reaction to what might come up in the call for sites.

## **Timing of development sites being brought forward**

In the general policies there are references to the Council's preference for brownfield sites to be developed before further erosion of the Green Belt and before development of other greenfield sites takes place. However we did not see any mechanism proposed to ensure this happens. Our concern is that once the Local Plan is adopted developers and land owners will immediately start putting forward detailed planning applications for the sites which maximise their profit potential (which are likely to be greenfield sites) and the preferred brownfield sites will remain undeveloped until the greenfield options have been exhausted.

While we have to accept that at some point development on more sensitive land will need to take place in order to meet the Council's targets for housing provision, this should only happen once sites which are less valuable (in terms of their impact on nature, local character etc) have been developed. Our concern is that once the Local Plan is adopted by the Council, developers will immediately bring forward planning applications for the most sensitive sites in the area (as these are the easiest to develop and lead to the highest profits) and these will get built out before the less sensitive sites.

We recognise that some developers specialise in city centre and / or brownfield development and so there will almost certainly be at least some building on previously developed land soon after the adoption of the Local Plan but nevertheless, it is clear that the priority of many developers will be in conflict with the stated aims of the Council's policies. We believe we should see some detail on how the Council proposes to follow through on implementation of the policies to ensure that brownfield sites are developed first, so that we can comment and possibly suggest further mechanisms for ensuring that land is used in an appropriate order.

## **Land owned and put forward for development by Leeds City Council**

We note that a number of the sites put forward for development in Leeds are owned by Leeds City Council. We are also mindful that, in common with other local authorities, Leeds City Council has financial challenges. Leeds City Council is essentially "marking its own homework" in the assessment of these sites and there is the potential to be swayed by the financial solution offered by them. It is therefore crucial that the Council is scrupulous and transparent in the assessment of its own sites.

## **Claims made by developers in putting sites forward**

Property development is a profit-driven sector with consultants and developers all heavily incentivised to push the boundaries in order to maximise the return from each site.

In our experience claims are often made which appear to be exaggerated or plucked out of thin air without any justification or backup and we doubt that this experience is exclusive to our area. We would therefore ask that any submissions made by parties putting sites forward for development be considered with great caution in terms of whether claims can be substantiated, and also ensure that any promises made in relation to a particular site (such as the inclusion of public green space within a site) are taken into consideration when detailed planning applications are brought forward. Some promises have already been made in relation to particular sites put forward for inclusion in the Local Plan and these should be reflected in the adopted Plan so that we can expect developers to adhere to these commitments when detailed planning applications are submitted.

## **Estimated Draft Housing Capacity**

For each of the sites that have been put forward for consideration for housing, an estimate of the site capacity has been made which appears to be based upon the gross site area and a figure for the housing density (number of houses per hectare) that is expected. This density figure is not constant across all sites in our neighbourhood and it is unclear what the difference is.

Prior to the final selection of sites an individual assessment of the true capacity of each site must be made. Our concern is that if this isn't done then many sites in the final plan will have a stated capacity that is too high but that developers will expect to get consent for that number of units when they submit detailed planning applications and we (the local residents) will be stuck with over-dense housing and / or an expectation that valuable trees and green spaces will be sacrificed in order to meet the 'target' capacity of the site.

We also believe that a 'one size fits all' approach to housing density across the city is inappropriate. The Adel Neighbourhood Plan emphasises that any new developments should reflect the character of the area, the main one being spaciousness even in developed areas. We believe that the final capacity figures for sites will need to reflect this – allowing space between houses for gardens and open areas as can be seen in existing parts of Adel.

### **Lack of holistic approach in site assessments**

Whilst we recognise that planning officers have had to find some assessment methodology, our abiding impression is that irrelevant or unimportant factors are making some Green Belt sites more vulnerable to development than other such sites which are no different or are more suitable for development.

To take two examples in our area, LPS00010 Tile Lane and LPS00862 Land at Dunstarn Lane, these are two similarly-sized large greenbelt areas of grazing land, both with glorious views over the Meanwood Valley, in one case views that are available to the public from a well-used footpath to Adel Woods. One of these sites scores -10 (orange - safer from development) while the other scores -5 (perhaps vulnerable to development). These sites are essentially of similar character and quality and the different scoring applied to them because of obscure technical reasons probably applicable only to minor portions of each site offends common sense.

We must emphasise in this critique that we oppose any development on either of these sites.

We do not accept the assertion that overall scores allocated to sites provide “a robust objective baseline ....which can be used to identify the best site options”.

As we describe below we think that the scoring methodology is subjective (due to the selection of indicators and the decision on what scores to allocate to particular criteria) and incomplete (due to the exclusion of numerous factors, at least some of which seem far more relevant than some of the selected indicators) and should be used only to exclude the most obviously unsuitable sites at this stage.

### **Draft Site Assessment Methodology – General Comments**

We have reservations about the general approach to short-listing sites using the scoring methodology. The use of numeric scoring gives a semblance of objectivity about the process (site A had a lower negative score than site B and so is preferred for development) but is entirely dependent on the chosen criteria and the range of scores given for each criteria – both of which are essentially subjective.

In terms of the scoring criteria, there are many factors which may influence the selection of one site in preference to another that are not being considered at this stage (for example, the capacity of local infrastructure to accept further development in an area). These factors will all need to be considered before a significant number of potential sites are excluded from further consideration, otherwise sites are not being compared fairly.

In relation to the actual scoring, some of the criteria give different scores to sites which are essentially equivalent in relation to that measure. For example, Accessibility to Public Rail Transport measures the distance (as the crow flies) to the nearest rail station. If Site A is 3.1km from the station and Site B is 3.3km then Site B would receive a greater negative score than Site A even though in practical terms the difference is negligible and it is highly unlikely that any resident would be more or less likely to choose to travel by train due to that difference. In addition, Site A may actually be further from the station when measured by the road network, thus rendering the comparison dubious.

We also note that a number of the criteria do not use the full range of scores (+3 through to -3). This is another way in which subjectivity is brought into an apparently objective process. For example one criteria only uses scores of 0 or +1 but this could have used scores of -1 and +2 instead (or -2 and +3) which would change the balance of some sites.

We are also very conscious that the scoring for different sites may change as the process of developing the Local Plan proceeds. For example, a site would get a negative score if there was an existing community facility within the site boundary or be excluded entirely on a gateway test such as the presence of ancient woodland. However that is not a good reason for excluding the site in itself – rather a change of the boundary could retain the community facility or the ancient woodland (and there would be a commensurate change in the site assessment). If a site has been excluded at this preliminary stage though, on the basis of considerations which might change at a later point, then this would disadvantage other areas.

## **Scoring Summary**

In summary we completely disagree that the proposed method ‘provides a robust objective baseline position for each site which can be used to identify the best site options...’. It certainly provides a numeric baseline for comparing sites but one which is neither robust nor objective given the high degree of subjectivity in the selection of the indicators and the allocation of specific scores within those indicators. Given the acknowledged omission of numerous relevant factors (such as conformity to a Neighbourhood Plan, ability of infrastructure to support sites) the overall score cannot pretend to identify the best site options, even if the deficiencies in the Indicator Test Criteria were all resolved.

The Gateway Tests and Indicator Test scores should, at the most, be used to exclude sites which are so unsuitable for development as to be obvious to most reasonable people. Excluding other sites based on these subjective numerical scores is inappropriate when other significant factors still need to be considered.

## **Draft Site Assessment Methodology - Gateway Tests**

### *Settlement Network*

We agree with the principle that this should be a Gateway Test but cannot comment further in relation to the main sites put forward within Adel until the additional work mentioned in the description has been completed.

### *Biodiversity and Geological Value*

As with some other tests, this references national standards. We agree that sites with this level of designation should be protected from development, but we also feel that many sites which aren't nationally designated still have enormous value to the environment and that development proposals should be strongly biased away from them. Some of the detailed site indicators are based upon environmental protection but not enough that they would only be developed if absolutely necessary.

### *Flood Risk*

Again, we agree with the principle of Flood Risk being a Gateway Test, but the test needs to be more holistic: as well as the likelihood of flooding on the site itself it should also consider whether development of the site will impact downstream communities. In the case of Adel, building over green fields has in some parts reduced the capacity of the ground to soak up water, causing significant flooding at the Adel Mill site.

### *Heritage Impact*

This test only considers whether heritage asset is present within the proposed site boundary and does not take into account whether any nearby heritage assets would be affected. In the case of Adel, the Grade 1 listed church and the housing at Adel Mill are special, in part, because of their setting which would be destroyed by adjacent development.

### *Ancient Woodland*

We have no particular comment other than noting that, as above for biodiversity, sites may not reach this very high standard but can still have great value which needs to be fully accounted for in the detailed scoring.

### *Green Belt*

We understand the reasons for removing this as a Gateway test but the explanation says 'it is important that the overall sustainability of such sites is tested through the detailed site scoring methodology set out under Stage 2'. It doesn't appear that any such tests have been included in the Stage 2 scoring and so sites in the existing Green Belt are considered to be no different to those which are not in Green Belt (and neither contribute to the avoidance of urban sprawl nor provide green space). This is clearly wrong.

While we have to accept that some development may need to take place on current Green Belt land the scoring should recognise the value of this land, much of which is valuable green space.

## **Draft Site Assessment Methodology – Detailed Scoring**

### *Indicator 7: Greenfield / Previously Developed Land*

We agree that this is a key concern for the Adel area – ensuring that development takes place on the least socially valuable land before spreading into green spaces.

While this measure does address previous land use versus green field sites it does not look at the quality of the green spaces (as the Green Belt Gateway test would have done).

### *Indicator 8A: Accessibility to Public Transport (Bus)*

This measure in particular shows up the inadequacies of the scoring method in relation to the Adel area. Two sites in this area (LPS00045 and LPS00547) differ by 5 points on this measure and while one is undoubtedly slightly less convenient than the other in terms of access to bus transport there is no way that the magnitude of the points difference is justified by the need to, say, walk 100m further to a bus stop with a more frequent service.

Adel is a relatively prosperous area and most households have access to several vehicles. While we support the increased use of public transport, in practice most residents choose to use their cars for journeys due to personal preference, even when a good bus service is available. As such this measure doesn't reflect the reality when assessing sites in this area either against each other or against sites in a different area where different factors come into play.

### *Indicator 8B: Accessibility to Public Transport (Rail)*

Measuring distance to the rail station as the crow flies is disingenuous, all the potential sites in Adel are around 4km or more (according to Google Maps) from the nearest rail station (Horsforth) when actually using the road network and that is not a sensible travel option for people in this area. Travel into the city centre to use the main station there is far more logical.

In Adel, proximity to Horsforth station is of minimal relevance. It is much too far to walk to be used for public transport into Leeds and local buses will be preferred. Regular travel for Adel people to Harrogate or York will be rare and the majority of people in Adel will choose to go by car (and use the excellent park and ride facilities in York) rather than drive to Horsforth station and struggle to park.

### *Indicator 9: Accessibility to Services (Walking and Wheeling)*

This indicator is based upon a separate analysis. We have looked at the referenced document but found it impossible to fully understand the calculation of the neighbourhood score from the information in that. We suspect that it will be highly variable, dependent upon the situation at the time of measurement. For example, access to primary schools may be good if a child has a place at one of the local schools, but currently children from some parts of Adel have to travel to schools outside the area which are not within walking distance. This may change over time meaning that a positive score today may become negative in the future if local

services leave the area (in the same way that the only GP surgery in Adel closed a few years ago requiring residents now to travel outside the area to access GP services).

#### *Indicator 10: Flood Risk*

We would expect for this indicator that a low flood risk would lead to a neutral score (ie zero) while increasing levels of flood risk would have increasingly negative scores. There also seems to be some duplication with the Flood Risk Gateway test – on the basis that if a site is prone to flooding which cannot be mitigated then it should be excluded, and if the flood risk can be mitigated then that should lead to a requirement that those mitigations are included in the design of the site, rather than necessarily being that the site is considered less suitable for development.

#### *Indicator 12: Biodiversity and Geological Value*

This criteria only considers those habitats with defined designations. Some sites may not be designated but can still have significant value as a habitat, and this will not be captured by this measure.

#### *Indicator 13: Woodland and Trees*

It is not clear if there is a definition of Long-established Woodland which is used in the assessment of this indicator. A number of the sites around Adel do contain some older wooded areas but, without knowing what constitutes Long-established Woodland we can't tell whether they should have received a score of -3 against this indicator.

#### *Indicator 14: Heritage Assets*

This criteria only considers whether there is a heritage asset actually within the site boundary. It does not consider whether development of a site would have a detrimental impact on a heritage asset which is nearby but outside the boundary of a site.

Site LPS 00547 Land south west of Eccup Lane and Otley Road Adel is relevant here. Part of the site is opposite Adel St John the Baptist Church, a grade 1 listed Norman church of national significance. Historic England have emphasised the importance of the continued isolated setting of this church. Development of this site would remove the isolation of the setting. Similarly, at the northern end of this site (but also outside it), Adel Mill is an ancient farmstead site with about 8 listed buildings. This ancient rural site would plainly be damaged by having encroaching suburbia being built right up to it.

Moreover, the Adel St John Conservation Area overlooks this site and the value of the long-distance views over this site is emphasised in the conservation area appraisal and the Adel Neighbourhood Plan. This must surely be taken into account.

#### *Indicator 16: Landscape Character*

This criteria is based upon the Special Landscape Areas defined in the UDP policy N37. This is out of date (based upon work done in the previous century) and does



not recognise any landscape value in the many green areas of the city. The Tile Lane site in Adel referred to above is a case in point, with scenery to rival any Special Landscape Area. Within the Adel area the recently adopted Adel Neighbourhood Plan highlights the expansive views across open fields from several parts of the area which many residents have commented on as being a key element of the 'feel' of the area but which are ignored by this measure.

*Indicator 17: Air Quality*

No comment.

*Indicator 18: Agricultural Land*

No comment.

*Indicator 20: Proximity to Hazards*

No comment.

*Indicator 21: Contaminated Land*

No comment except to state that we find it hard to believe that there is any aspect of contamination in the Tile Lane site in Adel which is agricultural grazing land.

*Indicator 22: Mineral Resources*

No comment.

*Indicator 23: Renewable and Low Carbon Energy Potential*

This criteria only allows for a score of 0 or -1. This does not distinguish greatly between sites, and if the Council is serious about the climate emergency then perhaps a greater range of potential scores should be used.

*Indicator 24: Green Space*

This criteria needs to be developed further to avoid perverse outcomes from the scoring process. When preparing the Adel Neighbourhood Plan we had initially included some areas for categorisation that were within the Green Belt. These were removed when we were told that it wasn't possible for us to do this as the Green Belt designation took precedence and land could not be designated as both Green Belt and Local Green Space.

As inclusion within the Green Belt has now been dropped as a Gateway test it now means that land which is designated as Local Green Space is considered less suitable for development than land which is Green Belt (as for this indicator, Local Green Space is given a score of -3 but Green Belt is given 0). This is perverse.

We understand the reasons for omitting Green Belt designation as a Gateway Test but the detailed scoring system should have been updated to recognise the value of this land – at present it has no weight at all in the assessment of sites.

Given that open spaces and easy access to the natural environment are so important to local residents we believe that this indicator should be updated, to include a score of -3 where land is within the current Green Belt. This would avoid the concern about Green Belt being a gateway test but recognise the fact that there is a lot of value in retaining such land in its current state.

*Indicator 28: Non-road Transport*

This criteria seems to be suitable for assessing a site's potential for residential development but if it was being considered for industrial use then co-location with rail freight may be a significant advantage.

*Indicator 29: Community Facilities*

No comment.

*Indicator 30: Town Centre Vitality and Viability*

No comment.

*Indicator 36: Waste Processing Facilities*

As for Indicator 28, this only makes sense for certain types of development.

*Indicator 37: Coal Referral Area*

No comment.

*Other factors:*

Other factors such as conformity with a Neighbourhood Plan, impact on the local road network and availability of local infrastructure, amongst many others, should be included in any full comparison of potential development sites.

## **Site Specific Comments**

*LPS00010 – Tile Lane, Adel*

This site is owned by Leeds City Council and we are concerned that the Council has a conflict of interest in assessing the scores for it.

The site is showing as 'Assess' for the Settlement Network Gateway Test which seems correct as things stand. We believe that development of the site would be inappropriate from a Settlement perspective and will review this again once the Council's detailed proposals for Settlement Networks are complete.

With regard to biodiversity and geological value, we can see no reason why this site is any different to the Dunstarn Lane site mentioned below. Presumably this is due to the precise definitions of the various terms but they make a distinction between the two sites that would be considered equivalent by local residents.

We are very surprised that this arable grazing site has been scored 1 as contaminated land. This is surely a mistake (either in the assessment of the score or an error in the dataset on which it is based).

With the green belt being removed as a gateway factor, as stated above, sites such as this should merit a -3 as Green Space. It is much valued locally, with the popular footpath running through it to Adel Woods providing beautiful views of the woods and across Meanwood Valley. The Adel Neighbourhood Plan shows key views across the whole of this site in Figure 14 of the Plan.

As mentioned above, the overall scoring of this site as -5 shows an over-reliance on a tick box process when a properly nuanced approach would clearly exclude this beautiful site from development.

The assessment of this site also has no regard to another key issue. It is accessible only via the narrow and rural Tile Lane which passes Adel Primary School- outside of which the traffic is already chaotic and has to be managed by the school caretaker. Traffic going past from a further 440 houses would be unthinkable.

#### *LPS00045 – Land East of Sadler Way, Adel*

The site is showing as ‘Assess’ for the Settlement Network Gateway Test which seems correct as things stand. We believe that development of the site would be inappropriate from a Settlement perspective and will review this again once the Council’s detailed proposals for Settlement Networks are complete.

#### **Green Space**

We believe that the site should be scored -3 for this indicator, rather than 0. Early in the process of developing the Adel Neighbourhood Plan this site was identified as having special value and was designated as Local Green Space. We were informed by Council Officers that land could not be classed as both Green Belt and Local Green Space and, since it is currently within the Green Belt, we had to remove the Local Green Space designation. We can provide copies of earlier drafts of the Neighbourhood Plan to show this designation if required.

Until the Indicator test is updated to recognise Green Belt land (see our general comments on Indicator 24) this should be given the benefit of a -3 score for being Local Green Space.

Conformity with the Adel Neighbourhood Plan. Although specifically excluded from the current assessment exercise, we feel that it is important to highlight that development of the site would go against some of the policies in the Adel Neighbourhood Plan, particularly Policy CFGS5 which aims to protect the Green Infrastructure Network.

Access to this site would only be possible via Sadler Way, which itself leads onto Church Lane. At busy times Church Lane is a major bottleneck with traffic sometimes queuing back from the Otley Road traffic lights to the Adel War Memorial Association.

This land immediately adjoins the Bedquilts playing fields which provide sporting and recreational space for residents. Bedquilts itself is a large open area bordered mainly with trees, hedges and gardens so that, particularly on the north side where this site is located, it appears to be in countryside rather than in a built up area. Development on this site would ruin the outlook and have a major impact on the character of the area.

#### Wildlife

The site is currently undisturbed meadow and woodland with patches of trees dotted around the main area, extensive undergrowth and a fully wooded area. It provides a wildlife haven and residents regularly see deer on the site, including one observed giving birth there.

When the Neighbourhood Forum asked if the landowners (The University of Leeds) would give consent for the patch of land next to Adel St Johns primary school to be used as a playground, they refused on the basis that it was an important wildlife corridor. The area off Sadler Way is the only possible next step in the wildlife corridor and so, by the University's own logic, development should not take place on this site.

Regarding rail transport (Indicator 8B) we believe that this site should have been scored as -2, given the flawed nature of the scoring measure (see comments above) and given that the minimum distance by road to the nearest station is well over the 3.2km limit specified (as measured on Google Maps).

There is a significant wooded area on the site containing many mature trees, including some protected with TPOs. We are uncertain as to whether this should be scored as -3 for Indicator 13 (Woodland and Trees) as the definition of Long-established Woodland isn't clear. In any event though the wooded area should be protected.

#### *LPS00132 Cookridge Hall Golf Course*

We are unclear on the status of this site as we have been led to understand that the golf club expect to continue operating and that aim would presumably be incompatible with the development of this site. No doubt this can be checked as inclusion of a large (600 home) site like this would distort the picture if there is actually no chance of it being available.

It has been given an assessment of -3 (rightly or, probably, wrongly given our concerns with the methodology) but should be removed or marked as inactive to prevent any impression that it might contribute to the required number of new homes unless the proposer of the site can show that it will be available.

#### *LPS00351 Land SE of Holt Park Leisure Centre*

This has been given a score of +7 and we see no objection to this site being developed

#### *LPS00405 – Bodington Business Park, Otley Road*

Our councillor has been advised by planning officers that this site has been put onto the list of potential sites by mistake. If that is the case, it should be removed immediately or at least marked as not active on the site allocation website.

If it is not a mistake, we would make the complaint that the site has been given a very misleading title which will have precluded members of the public from objecting.

There has never been a business park in this location. The site is actually the cycle track of the Brownlee Centre.

This is a regional, if not national, asset. Triathlon is one of the few sports in which the UK is a world leader. Leeds has become the UK centre of triathlon thanks to the influence and achievements of the Brownlee brothers. It is a great part of the attraction to the various universities in Leeds of many would-be elite triathletes. Building on this site should be unthinkable.

We have been less than impressed that the consultation on site allocations has been during the main holiday period. For the students who use the Brownlee track, they will potentially have been away from Leeds during the whole consultation period and may have no knowledge of any development proposals for the site.

#### *LPS00414 University of Leeds, Lawnswood site*

This is a greenfield site. It has been used as playing fields but never open as such to the public. For many years it was the playing fields for Leeds Grammar School. We believe it passed to Leeds University as part of the transaction under which Leeds Grammar School moved to Alwoodley Gates. The playing fields have probably been underused by the university and appear not to have been in any recreational use for some time. The land is not green belt.

Whilst we regret the loss of any greenfield land, we think this site might be suitable for development. Access could be made onto Otley Old Road and the site could remain discreetly hidden behind the existing boundary of fine mature trees (the preservation of which would be essential for the continued enjoyment of neighbours on the other side of Otley Old Road and New Adel Lane).

#### *LPS00482 Asda Supermarket*

This site has been given a score of +9 and we see no objection to this site being developed

#### *LPS00547 – Land South West of Eccup Lane and at Otley Road, Adel*

A significant part of this site fell within site HG2-18 in the previous site allocation process. It was decided that approx 100 houses could be built on the site and that number have been completed. The site is fully built out. A remaining part of the site was left as green field. It is outrageous that this land has been put forward for additional development over and above the previous allocation. Site LPS00547 should be excluded on this ground alone.

With regard to settlement, the proposed site plainly falls outside the Adel settlement, as brief inspection will demonstrate. Any assertion by the developer to the contrary cannot be relied upon. Development of this site would constitute very obvious urban sprawl of the type which Green Belt status is still designed to prevent.

This site also fails the gateway floodplain test. Any flooding would go in the direction of Adel Mills, whose residents state that they have suffered worse flooding since the erection of the Centurion Fields and Elysian Fields developments and who very much fear the flooding consequences of development on this site.

This site should also fail a more nuanced national heritage assets gateway test as set out above.

There would also be a question of access to the site. The site is adjacent to Church Lane on the eastern side, but that is a narrow road with very limited visibility along that stretch so unsuitable for vehicles exiting any development. The plan shows a short boundary with Otley Road on the western side but it is unclear whether a further access onto such a busy road would be appropriate in such close proximity to the existing exit for the recent Elysian Fields development.

The total scoring for this site (insofar as is relevant after serial failure on gateway factors) should actually be -18 (not -15) as the recent designation of the non-greenbelt part of it as Green space has been omitted.

There should be a further -1 in connection with Horsforth station which is of no benefit to this site.

#### *LPS00653 – Former Weetwood Police Station, 300 Otley Road, Weetwood*

This site is rated Green and currently has planning permission for a development of 127 rental apartments.

The Neighbourhood Forum considers that this site, having been previously developed, is suitable for residential development and supports its inclusion in the final Local Plan. It should be clearly marked as having a capacity of 127 homes, not the 54 stated on the website

#### *LPS00862 – Land at Dunstarn Lane, Adel*

This site should fail the gateway settlement test. It is bordered by only a few houses on part of the northern side. The remaining borders are all open. It provides beautiful views over the Meanwood Valley which would be destroyed by development.

The site also fails the gateway floodplain test so should be excluded on those grounds too.

The scoring of this site should be even lower with a score of -3 given on the Green Space indicator to compensate for the removal of the Green Belt gateway test and a further -1 to allow for the irrelevance of Horsforth station to the site.

Additionally, this site could only be accessible from Dunstarn Lane, which is a quiet suburban road. Dunstarn Lane already has the burden of traffic from around 42 new

houses at the nearly completed development at The Heath. Traffic from a further 400 houses would not be sustainable.