

From:
To: [Site Allocations Plan](#)
Subject: PDE00074_LCC Site Allocation Consultation
Date: 02 November 2015 12:17:21

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27/10/15

Dear Sir / Madam,

Response to Leeds City Council Site Allocation Consultation

I wish to comment on the housing development proposals for the **Aire Valley in the vicinity of Rawdon**. My initial general responses are to the overall plan and are followed by specific points relating to the designated sites.

OVERALL PLAN

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- a) It is the opinion of many who have scrutinised the data that the number of new houses proposed for Leeds, at approximately 70,000, is preposterously high; a figure drawn from 2008 data to forecast demand for accommodation some 10 years later, after a major down-turn in the national and local economy. Current data suggests the more realistic number should be about half that but Leeds City Council (LCC) have refused to review housing demand until 3 years hence, by which time the developers will have built over much land that is currently Green Belt or Green Field.
- b) Almost all the proposed development of 2,300 houses in Aireborough and Horsforth will take place on Green Belt and Green Field sites, consequently destroying the green character of the area, so valued by residents. This also applies to the safeguarded sites which have been reserved for future development. Government policy is quite clear that Green Belt should be protected from development to prevent urban sprawl and to ensure that open land remains open as identified in "Protecting the Green Belt". LCC have disregarded the sentiment of this document with these proposals and indeed, have drawn up a plan that is contrary to their own UDP which states that Green Belt should be safeguarded other than in "exceptional circumstances". House building does not constitute exceptional circumstances. Once gone, it will be lost forever.
- c) Not only will the divide of green spaces between the distinctive districts of Horsforth, Rawdon, Guisely and Yeadon be blurred with this proposal, the impact of the development in adjacent Bradford will also join two conurbations to create a vast area of urban sprawl. The historic character of these separate communities will be destroyed and access to semi-rural landscapes for leisure activities, highly prized by residents, will be lost and the quality of their life will be diminished. Furthermore, important natural habitats for wild plants and animals will be destroyed, reducing the bio-diversity of the

city as a whole. Again, these are contrary to national and local policy.

- d) It appears that with no public consultation, LCC have altered the designation of Green Belt to Green Field in Aireborough - an underhand method to make more land legally available for building. Apparently new areas of Green Belt have been defined in alternative areas of Leeds so that on paper the City appears not to be losing green-space as a result of this massive city-wide housing project.
- e) The majority of tourists who visit Leeds are said to approach the City from the airport via the transit bus route. Currently a positive impression is gained of the outer City, passing through significant stretches of green, semi-rural land along the A65 corridor before reaching the Ring Road and then into urbanisation. The proposed Rawdon/Horsforth developments will destroy this positive feature forever.
- f) The principal roads are already at capacity for much of the day and are under great strain during rush hours due largely to the recent surge of house building in Aireborough as a whole. Dependence on cars is exacerbated because the local public transport system is inadequate, despite recent and on-going improvements to the arterial roads and railway system. There appears to be no plan to enable the inevitable and significant increase in road traffic to move freely or to up-grade the public transport that could reduce private car use.
- g) Other infrastructure issues have not been adequately addressed in the plan. There will be a huge increase in demand for school places in an area where all the schools are already over-subscribed; similarly access to doctors' and dentists' surgeries for new patients is almost impossible. If all available green space is used for housing where will the needed schools and medical centres be built?
- h) Building high density housing estates on the urban fringe of Leeds is an unsustainable environmental policy. It leads to ever increasing numbers of people commuting into the city and beyond by car, producing higher levels air and noise pollution for residents and of course contributes to greenhouse gas emissions. Much greater consideration should have been given to building homes on the many brown field sites in central Leeds, converting unoccupied commercial premises to houses or flats and ensuring that empty housing stock is brought back into use. These measures would help to reduce car commuting and make walking or cycling viable alternatives for people to reach work.
- i) If the City really does need this scale of house building, which is contestable, there are open areas on the outskirts of eastern Leeds which could be easily connected to the major road networks that link neighbouring cities and other regions of Great Britain. New residents in this area would not then add to the overcrowded commuter routes in Aireborough. The topology of the Aire Valley does not lend itself to major road schemes without destroying the interesting character of the communities in a Yorkshire Dale's landscape.
- j) The nature of house building already started suggests that there will be few starter homes or smaller accommodation for the elderly and no social housing included, thus ensuring that it is the developers who profit from the scheme, not the local community.

GENERAL CONCLUSIONS ABOUT SITE ALLOCATION CONSULTATION

1. The plan cannot be regarded as positively prepared due to the negative consequences on the quality of life for present and future residents.
2. The plan is not justified because it is based on out-of-date and incorrect figures for the future demand for housing in Leeds.

3. Since the plan takes no account of existing inadequacies in the infrastructure and the consequent exacerbation of difficulties it will produce, the plan cannot be considered effective.
4. The plan is not consistent with national policy in respect of building on designated Green Belt.

DESIGNATED SITES

HG2-41

This large site, within Green Belt as identified in the Leeds Core Strategy, is termed “strategic green infrastructure” and in the Leeds UDP it is described as a “special landscape”. Authors of this document clearly understood the importance of the land because it creates a clear demarcation between suburban Leeds and the semi-rural fringe of the City, acting with the Ring Road as barrier to ever expanding urbanisation. Initially this land was not included in the Site Allocation proposal yet it is now there, seemingly by sneaky means and with no consultation [*see d) above*].

The portion of the land that is given over to cultivation of summer fruit and vegetables (known as Strawberry Field) is a valued community amenity and the rest forms part of the Aire Valley green corridor, important for wild life, for recreational walking on the public footpaths that cross it and for emphasising the rural nature of the Leeds- Liverpool canal west of Rodley, which is another important leisure resource. Red Kites live and breed in the nearby woodland and are a reintroduced species in Great Britain, having the highest degree of legal protection. Not only will the birds’ feeding grounds will be compromised by the enormous scale of housing proposed for the site but also the quality of life for residents will be damaged.

The plan for some 800 homes on the site, with probably double that number of cars exiting onto the already heavily congested Ring Road, will have very negative impact on everyone currently using the existing road network [*see f) above*]. The full impact of current building on the former Sandoz site is yet to be felt but recent alterations to the roundabouts have done little to ease severe congestion and they were not design to ease the flow of additional future traffic. Strategic planning seems not to have been considered with this site allocation [*see h) above*].

This site cannot be justified as it does not agree with the NPPF and does not agree with policies in the Leeds Core Strategy. It has been neither positively nor is it legally compliant, failing on all 4 points invited for comment: positively prepared, justified, effective and consistent with national policy.

HG2-43

The main reason for objecting to developing the Horsforth Campus site beyond the former college buildings is that it is yet another Green Field site within Green Belt [*see b) above*]. Building on this land will simply add to urban sprawl, blurring the present obvious division between suburbia and the semi-rural environments beyond the Ring Road. Inappropriate development such as this will be by definition harmful to the Green Belt and therefore should be resisted.

Part of the site has been listed as a nature reserve and the land abuts the established Rodley

Nature Reserve, an area of great importance to over-wintering wild fowl and summer migrant birds as well as for many other indigenous creatures and wetland plants. Safeguarding such lands is a vital part of the UK Biodiversity Action Plan *[see c) above]*.

The proposed 200 house for the site will add negatively to existent traffic problems *[see f) above]* so cannot be regarded as acceptable.

This site also fails on the counts of positive preparation, justification and effectiveness.

HG2-12

Now defined as Green Field it was identified in the Leeds Core Strategy as Green Belt, where it was also described as “Strategic Green Infrastructure”. Therefore it is contrary to LCC policy to include this land in the housing proposal and there has been no consultation about including this site. *[see b) and d) above]*.

Since it is adjacent to the Rawdon Cragg Wood Conservation area, which is singled out in the UK Biodiversity Action Plan as priority habitat, any development close to it will have a negative impact on wildlife. Moreover a number of footpaths and tracks cross the site so development will curtail recreational activities of current residents.

This site cannot be justified as it does not agree with the NPPF and does not agree with policies in the Leeds Core Strategy. It fails on all counts: positive preparation, justification, effectiveness and consistency with national policy.

HG2-10

Though identified as Green Field this can only be described as an infill site that will link Rawdon to Yeadon/Guiseley. It is precisely the kind of development that Green Belt is intended to prevent – continuous urban sprawl. It seems that the land is variously owned and one at least have not has given permission for his land to be included in the Site Allocations and that previous speculative planning applications for housing have been successfully contested. *[see b) above]*.

It cannot be justified to build on this site when there are large tracts of Brown Field land within central Leeds.

HG2-9

It seems to me incredible that any developer would wish to build houses on this site because the chance of people actually wishing to buy a house there seems remote as the location is directly next to the runway of Leeds-Bradford Airport. Noise and air pollution will make this a most disagreeable place to live! However, Yeadon Tarn is adjacent to the site and used by a variety of wildfowl, especially in winter (who seem not to be disturbed by aircraft noise) but may well suffer if housing impinges onto this rough land which provides feeding and breeding sites.

It cannot be justified to build on this site when there are large tracts of Brown Field land within central Leeds.

HG3-2/3/4 Safeguarded sites

Each of these sites is in Green Belt and shown as “Strategic Green Infrastructure” in the Leeds

Core Strategy. Therefore again, it is contrary to LCC policy to include this land in the housing proposal. [see b)]. The HG3-3 and 4 sites are also included as priority habitats in the UK Biodiversity Plan and the HG3-2 site is adjacent to the UKBAP Priority Habitat pond which has endangered newts.

These sites cannot be justified for future development because their inclusion is contrary to Leeds' environmental and Green Belt policies: “.... planning positively for the creation and protection, enhancement and management of networks of biodiversity and green infrastructure”.

FINAL CONCLUSIONS ABOUT DESIGNATED SITES

1. The proposal to build houses on this scale on these sites is deeply flawed in terms of the negative impact on the infrastructure as a whole and on the environment for current residents so it cannot be regarded as sustainable as defined by NPPF. Moreover, in some cases the proposal is not legally compliant with regard to national Green Belt policy.
2. Aireborough has already absorbed a huge amount of new housing from the many Brown Field development sites, with more coming on stream shortly both from our immediate neighbourhood and from adjacent Bradford districts; the effects of these on infrastructure and quality of life have still to be measured. When there are so many Brown Field sites available in central Leeds, it is totally unreasonable and against Government policy to ignore these in favour of building on Green Belt land. Residents of Aireborough feel that we have done our part to contribute to new housing and feel that now enough is enough!
3. Clearly, building on Green Belt is easier and more profitable for developers than building on Brown Field sites but the only ones to profit are the developers. Local residents have their quality of life degraded through loss of the amenity of countryside as well as facing more noise, pollution, congestion and excessive demand for essential services such as schools and health centres, for which there is no provision in the plans.

I hope that this LCC Site Allocation Consultation is not just a “paper excises”. The grave concerns and outright objections to the proposals for the Rawdon vicinity expressed by very many residents should be taken seriously and lead to a radical reduction in the number of new houses to be built in the area, particularly those planned for Green Belt and sensitive Green Field sites.

Yours faithfully,

Marian Smith



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