

**From:**  
**To:** [Site Allocations Plan](#)  
**Cc:**  
**Subject:** PDE00483\_Objection to Leeds Site Allocations Plan HG2-12  
**Date:** 09 November 2015 20:18:18

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Dear sir/madam

I wish to object to the proposed development of the following Green Belt site

**SITE HG2-12 (4254) - Woodlands Drive, Rawdon or, as it is known locally, 12 Acre Field - allocated for 130 houses**

I will however also refer to the following PAS sites (reserved for building after 2028) since together they all lie along the border of Rawdon with Horsforth and have common reasons for objection.

SITE HG3-2 (4095) - Knott Lane West - PAS 61 houses

SITE HG3-3 (3331) - Knott Lane East - PAS 35 houses

SITE HG3-4 (3329) - Layton Lane East - PAS 95 Houses

**The proposal to include these Green Belt sites in the Leeds Site Allocations Plan (SAP) is NOT consistent with the National Planning Policy Framework (NPPF).**

(i) All these sites are Green Belt land. HG2-12 is Grade 3 farmland and is regularly used for grazing and [growing](#) animal feed. The NPPF states that Green Belt is protected and requires "very special" circumstances to be built on. Housing targets (and especially overly optimistic housing targets) set by Leeds City Council cannot possibly be seen as an exceptional circumstance. Leeds City Council's promise to offset loss of Green Belt (in Aireborough) by creating "new" Green Belt in the North and North East of the city is a total red herring. That land is already arable farmland and renaming it "Green Belt", would change very little in terms of any environmental impact. The loss of fields like HG2-12 would have significant environmental impact. As the NPPF states - "the essential characteristics of Green Belts are their openness and their **permanence**".

(ii) The NPPF states that Green Belt should check unrestricted urban sprawl and to prevent adjacent settlements from merging. Site HG2-12 and the neighbouring HG3-2/3/4 sites all sit on the border of Rawdon and Horsforth, and together with the [proposed](#) huge development on the Horsforth side (HG2-41) this would mean a merging of Rawdon and Horsforth and therefore again not consistent with National Policy.

(iii) In addition the NPPF promotes the use of brownfield ..."by encouraging the recycling of derelict and other urban land" for development rather than using the Green Belt. Brownfield sites ARE available across Leeds, but for one reason or another they are not being used for housing. There is a widely held suspicion here in Aireborough, where

we have very few brownfield sites left, that the developers are rejecting brownfield sites on the grounds that they cannot make profit on clearing them for housing and that it is so much easier for them to simply plough up a green field. But the principle to allow Green Belt before brownfield in Leeds cannot be justified and again is not in accordance with the NPPF.

**Leeds own Site Allocations Plan (SAP) provides little justifiable evidence for the development of HG2-12.**

HG2-12 was first introduced into the Site Allocations Plan published in January 2015 and it was never included in the June-July 2013 Public Consultation and therefore not in LCC's Issues and Options document.

The following statements have been made by Leeds City Council (LCC) in the various Site Allocations Plan versions since January 2015 about this site :-

"Site to be PAS along with 4095 (Knott Lane West) and 3331(Knott Lane East)" – (January 2015 but since removed)

"Knott Lane barely suitable for additional development" – (Current SAP)

"New York Lane unsuitable to provide vehicular access" – (Current SAP)

"High potential to lead to unrestricted sprawl" – (Current SAP)

"Site performs an important role in safeguarding from encroachment" – (Current SAP)

"Greenbelt site.....less sequentially preferable to other sites"- (Current SAP)

All of these statements from LCC's own documents hardly provide convincing proof that this site should be high on the development list.

**Access to HG2-12 has not been thought through, making its inclusion into the Site Allocations Plan (SAP) unsound.**

HG2-12 is bound by two private roads (Woodlands Drive to the South and East and New York Lane to the North) and by Leeds Country Way footpath to the West. The gate that opens up to Knott Lane (opposite the Crematorium exit) is very narrow and runs parallel to Woodlands Drive so is unlikely to be used. The Site Allocations Plan still talks about the unsuitability of New York Lane, Knott Lane and Woodlands Drive and the only mitigation measures mentioned in the SAP would be "improvements to Knott Lane and A65 junction" which is contingent on combining the site with "4095 (which) would allow Knott Lane to be improved and access taken through this site".

Since 4095 (or HG3-2) is PAS and therefore not considered for development until after 2028 then any access through it would not exist in the short-term, which makes access to HG2-12 unsound in the Site Allocations Plan.

No mention has been made of using Southlands Avenue in the Site Allocations Plan, yet that would seem a logical point of access. That would mean a quiet 5 metre wide cul-de-sac would become a busy thoroughfare, where children would no longer be able to play safely as they do now and there would be no more street parties as we have had in

the past. I have lived on this tree-lined avenue now for 33 years and the thought of it changing horrifies me. It would be disingenuous for anyone to play the “NIMBY” card here. We each choose to live where we live and we chose here exactly because of its quiet location and immediate access to the countryside.

**HG2-12 is part of Leeds “Strategic Green Infrastructure” and therefore any development of it goes against the Leeds Core Strategy.**

HG2-12 is adjacent to the Cragg Wood conservation area. The trees in High Knott Wood, some of which grow within the HG2-12 site, are all covered by TPO’s. The site is a habitat for roe deer, bats, tawny owls, red kites, sparrowhawks and many species of migratory birds.

In its Core Strategy, Leeds have identified the land in this area between the A65 and the River Aire, which includes site HG2-12, as “Strategic Green Infrastructure”.

How then can this be consistent with any proposal to build 130 house upon it ?

**Leeds City Council has based its Site Allocations Plan on an over-optimistic housing target**

I know that Leeds City Council does not want to hear any more on this subject, but it is the most fundamental flaw in its Core Strategy and therefore its housing plans.

According to one version of Leeds own Core Strategy “in 2010 there were an estimated 755,136 people, with a forecast for this to reach 860,618 by 2028. This is a growth of 105,038 people, equating to approximately 44,508 new households (at an average of 2.36 persons per household)” – so why do we have this ridiculous figure of 70,000, which, almost everyone (except LCC), accept is based on old and highly optimistic figures.

Leeds City Council continues to bury its head on this issue and refuses to revise its housing targets even when faced with lower Office of National Statistics (ONS) projections, based off the last census, which would mean the city only needs a further 45,000 houses.

Any reduction down to these lower levels would automatically remove the need to develop on any Green Belt land, like HG2-12.

**There is no infrastructure plan to support any development in Rawdon.**

Ask anyone in Aireborough about the A65 and they will all tell you about how heavily congested this road is. It is however yet another area where the Council refuses to accept there is a problem. The recent changes to the Horsforth roundabout may have taken some of the confusion that existed beforehand but has done little to cut the tail-backs westwards up the A65. At peak times these can be a mile or more long most working days, both in the morning and the evening.

Given the current status, it is hard to imagine what the situation would be like with all the additional housing proposed along the A65 from Guiseley to Horsforth, not to

mention the Airport link road (all 3 options of which are destined to go through Horsforth/Rawdon – how imaginative !)

The issue I have here, is that Leeds City Council do not include anything in their housing plans for this area that suggests they have even thought about the consequences for additional traffic on the roads. It's as if they want the houses built, come what may, and then they will worry about the roads afterwards (and even then that might be optimistic on my part).

It's a similar situation with schools, and medical facilities which are all currently oversubscribed here in Rawdon and Horsforth. It seems the policy is to build first then worry about issues like these later – hardly the basis for a sustainable plan.

### **Will Leeds City Council listen to the feedback from the Public Consultation process ?**

I do hope that Leeds City Council will listen to the feedback they get from this public consultation.

I would also hope that the overwhelming need of the Council to work with developers in order to achieve their housing targets, does not outweigh the voice of individual communities.

In terms of the consultation process itself, I think that a lot of the terminology used by the Council has, in my opinion, been deliberately designed to confuse and even mislead the public. Examples include :-

1. Safeguarded Land or PAS (Protected Area of Search) – meaning anything but safeguarded – it is land that will be held in reserve for future building after 2028.
2. All the sites were recently renamed just before the Public Consultation process began – so field 4254 became HG2-12, 4095 became HG3-2 and 3331 became HG3-3 etc. Was this done deliberately to confuse the public ?
3. Greenfield and Green Belt are used interchangeably in LCC documentation – this is misleading, Greenfield can be any open space, but Green Belt has 5 specific purposes according to the NPPF and is therefore more significant and protected. HG2-12 is Green Belt.
4. The response form that Leeds City Council asks the public to use in the Public Consultation is very limited and prescriptive – which is why I decided to write this email instead.

Apart from the council, and whether they will listen, I have concerns that HG2-12 is already a done deal. I understand that the farmer who uses the land has already been given notice to quit and it is widely rumoured in Rawdon that one developer has already bought the land from the owner, or at the very least has an option to buy. This only adds to my concern that the fate of HG2-12 has already been decided. I truly hope not.

Nevertheless please accept this email as my full objection to the development of HG2-12, which I would like to be taken into account by the Planning Inspector.

I would also like to be kept informed on when the Public Examination will take place.

My Personal Details are :-

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Regards

Martin Fincham