

From:
To: [Site Allocations Plan](#)
Subject: PDE00564_Consultation Site references: HG2-12, HG2-41, HG3-2, HG3-3, HG2-43
Date: 09 November 2015 08:44:23

LDF Publication Draft Consultation
Forward planning & Implementation
The Leonardo Building
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Dear Sir or Madam,

Re: Leeds City Council Site Allocation Consultation - HG2-12, HG2-41, HG2-43, HG3-2, HG3-3

I write with reference to the proposed building of houses on the above sites and with particular regard to the use of Greenbelt land for this purpose.

The stated aims of the Green Belt policy within the recent National Planning Policy Framework are:-

- To check the unrestricted sprawl of large built-up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

The use of the above areas for development clearly flouts many of these objectives and is inconsistent with national policy. The first two points are particularly relevant given that there remains only a tiny section of the Aire Valley remaining under protection separating the urban areas of Leeds and Bradford. The development proposed under **HG2-42** has further significance in that it will effectively merge Horsforth and Rawdon, both areas which currently and historically have maintained their own proud identities.

All the areas to which this objection is related are a valuable recreational resource to surrounding populations for cycling, rambling, bird-watching and dog-walking. Additionally they provide a refuge and green corridor for the valley's wildlife which includes badger, deer, fox, bat, and a plethora of garden and migratory bird species which will suffer from further encroachment and destruction of breeding and feeding sites.

With particular reference to **HG2-12**, the Council's own Site Requirements Document shown at the Consultation Meeting identifies that there would be significant ecological impact on parts of

the site which is also in the setting of a Listed Building and the Cragg Wood Conservation Area. Whilst the plan does mention mitigating the impact on all of these factors, it is difficult to envisage how any development in this particularly sensitive area will not irrevocably damage both nature and the overall character of the area which is enjoyed by so many people.

The expansion into this Greenbelt land (whether land is removed for building under Phase 2 of the Leeds plans, or removed from the Green Belt to assist with enabling further building at a later date) is wholly unacceptable particularly in light of the response from the Housing Minister, Brandon Lewis, on 3 February in the Commons where he stated that **“Unmet housing needs should not exceed maintaining the greenbelt, and this is put forward in the National Planning Policy Framework”**. Given that response, Leeds City Council is clearly acting in contradiction to national policy.

Additionally, the Leeds Core Strategy refers to minimising the Greenfield and Greenbelt land for development yet the map shown under Section 4.11 (Page 60) reveals that many of the sites proposed for development are, in fact, in Green Belt. On this basis, Leeds City Council appears to be contradicting not only national policy but also its own stated policy.

Having studied the plans at a recent Consultation meeting, the only reference to improving the road, schools, and medical infrastructure serving these areas is a requirement for the developers to contribute to this work as part of their plans. This will be a Section 106 requirement although should the development go ahead it is to be assumed that this work will be a priority in the planning permissions so that these essential facilities are completed prior to the actual housing and whilst the developers cannot plead lack of budget to complete. The Council should maintain full accountability for any subsequent changes to planning consent.

As part of the consultation process, Leeds City Council asked 5 key questions in terms of soundness of the proposals. In addition to my comments above, my specific response to these is as follows.

The development is not justified:-

- The current distinctive valley views and rural character of Rawdon village will be lost forever
- All sites are with LCC's own designated Special Landscape Area, particularly those sites at **HG-12** and **HG2-41**
- **HG-12** is within the immediate setting of Cragg Wood Conservation area
- Leeds Country Way runs through **HG-12**, and this is within LCC's own designated Strategic Green Infrastructure Area
- Wildlife habitats lost forever including palmate newt colonies at both **HG3-2** and **HG2-12**. All sites contain protected mature trees and woodland.
- There are major problems in the methodology of assessment particularly with regards to **HG-12**. This was allocated a sustainability score of -7, the worst of all nearby sites. Greenbelt Assessment shows this site to have the greatest impact compared to other sites yet it remains allocated under Phase 2 of the proposed development without any clear explanation for this decision.

The development is not effective:-

- <!--[if !supportLists]-->• <!--[endif]-->The phasing of **HG2-12** appears undeliverable and contingent on development of the safeguarded sites at **HG3-2** and **HG3-3** but is scheduled first for delivery
- <!--[if !supportLists]-->• <!--[endif]-->Highways access is limited for **HG2-12**. Knott Lane would need major work to enable it capable of serving **HG2-12, HG3-2 and HG3-3** and work would need to consider the current volumes of Crematorium access traffic using the road as well as additional traffic from the new developments
- <!--[if !supportLists]-->• <!--[endif]-->Water flooding is a feature of **HG2-12** and also forms part of the special natural habitat in this area. It might also make the site undeliverable.

The development is not legally compliant:-

- <!--[if !supportLists]-->• <!--[endif]-->There was no consultation on site **HG2-12** prior to it being allocated to housing in the Site Allocation Plan
- <!--[if !supportLists]-->• <!--[endif]-->**HG2-12** was not included within the Issues and Options consultation in June 2015 and is not compliant with the Statement of Community Involvement
- <!--[if !supportLists]-->• <!--[endif]-->In now understand that there was public consultation about Council development plans in 2013 but neither I nor any of my colleagues and neighbours were aware of this and no appreciable communication about this was made available.

The development is not positively prepared:-

- <!--[if !supportLists]-->• <!--[endif]-->Site allocation Plans for these Rawdon sites are not based on a comprehensive Greenbelt review as required by the previous Inspector when he passed the Core Strategy as sound
- <!--[if !supportLists]-->• <!--[endif]-->The selective green belt review undertaken by Leeds City Council means that the Core Strategy and Site Allocations Plan are now unsound

The development is not in accordance with the National Planning Policy Framework

- <!--[if !supportLists]-->• <!--[endif]-->In particular chapters 9, 11, and 12 – Protecting Greenbelt, Conserving Natural Environment, and Conserving Historic Environment respectively. ‘Growth’ is defined as the exceptional circumstance pertaining to these areas being designated for building but Government Ministers have stated that this is not an acceptable reason for riding roughshod over the Greenbelt principles.
- <!--[if !supportLists]-->• <!--[endif]-->I understand that a requirement of any development will be a minimum of 35% ‘affordable housing’. I would stress that should there be any development then this needs clarifying in the plans to mean starter and retirement homes that are affordable which is a more accurate reflection of housing needs in the area.

In conclusion, I believe that the proposal for development of the sites detailed in my heading

are seriously flawed and not in the interests of not only the local residents but those from further afield who use the area as attractive and accessible green space. The requirement for 70,000 new homes within Leeds is not evidenced by any up to date data and the Council is unwilling to review those statistics until the damage is done and the housing has already been built.

Yours sincerely,

Julian Clough