

From: [REDACTED]
To: [Site Allocations Plan](#)
Cc: [REDACTED]
Subject: PDE01081_SAP Consultation Response
Date: 15 November 2015 22:56:21

Dear Sir/Madam,

I am writing to object to the Leeds City Council Site Allocations Plan on the grounds that I do not believe that many of the sites identified in Aireborough are not adequately justified, not effective, have not been positively prepared and most pertinently not legally compliant. My express concerns and the following comments relate to the following sites HG2-12, HG2-41, HG3-2, HG3-3 and HG3-4.

Leeds City Council's own designated Special Landscape Area would be irreversibly damaged with important elements completely lost. The distinctive open valley views and rural character of Rawdon village and Leeds/Bradford green corridor would be adversely impacted. With sites HG2-12, HG2-41, HG3-2, HG3-3 and HG3-4 suffering from significant adverse impact upon both their visual and landscape character. This would extend to significant adverse impact upon the Rawdon Cragg Wood conservation area through the direct impact upon both its setting and views which are so important to its historic character and can be considered as the vital characteristics which warranted its designation as a Conservation Area. This can be found in the Cragg Wood Conservation Area Appraisal. HG3-3 is within this conservation area whilst HG2-12 is within the immediate setting of it.

Further to this I have reason to believe that no comprehensive greenbelt review was undertaken. This is a requirement of the Core Strategy and if the council had completed a genuinely comprehensive Greenbelt review the site allocations would have followed it, and not lead the plan.

The current proposals would have an unmitigated impact upon the local area and its important Greenbelt land, the land occupied by allocated sites HG2-12, HG2-41, HG3-2, HG3-3 and HG3-4 is all in Greenbelt. It is this designated land which contributes to the narrowing separation of Leeds and Bradford along the Aire valley and serves to separate the village of Rawdon from the town of Horsforth. This Greenbelt land help to define Rawdon and preserve the green village character from the growing urban extension of Horsforth. Furthermore it is the only strip of undeveloped land between Leeds city centre and the outer edges of Guiseley and Menston. Ghyll Beck (which runs through the edge of HG3-4 is the historic boundary between Rawdon and Horsforth. The development of this land would greatly contribute to an unadulterated urban sprawl, unifying numerous settlements into one large, unchecked urban mass. This would undermine the very principle of the Greenbelt designation and more so be intrinsically irreversible.

With the above in mind I believe that developments on the sites HG2-12, HG2-41, HG3-2, HG3-3 and HG3-4 is NOT in accordance with the National Planning Policy Framework. Especially chapters 9 Protecting Greenbelt, 11 Conserving Natural Environment and 12 Conserving Historic Environment. I don not believe that the council can reasonable demonstrate that the Greenbelt should be released on the grounds of 'exceptional circumstances'. There are numerous alternative sites which have been disregarded in addition to the incompetent greenbelt review by Leeds City Council which remains unsound and not fit for purpose. The Site Allocations Plan sites are not based on a comprehensive Greenbelt Review as required.

By not considering alternatives, the Council has not proved that 'exceptional circumstances' exist

to outweigh the harm that development would cause to the greenbelt sites here. The Council say that 'growth' is the exceptional circumstance which will justify the harm that development would cause to the Greenbelt. I do not believe that this is adequate reasoning and I believe that the planning system and central government would support this notion.

In addition to the irreversible damage that would be inflicted upon the Greenbelt, there is the impact upon the Strategic Green Infrastructure of Aire Valley. This will be greatly impaired and potentially lost forever. Increased development across the sites HG2-12, HG2-41, HG3-2, HG3-3 and HG3-4 will negatively and significantly impact upon enjoyment of area for walking, cycling and horse-riding. It will also harm the nature and ecology of the sites and the wider area. Leeds Country Way runs through HG2-12 and alongside HG3-2 and HG3-3, as well as the incredibly well used public footpath which runs through HG3-4. All sites part of LCC's own designated Strategic Green Infrastructure Area.

Furthermore HG2-12, HG3-3 and HG3-4 are UK Biodiversity Action Plan (BAP) Priority Habitats, within HG3-4 alone I have personally spotted and witnessed amongst many other species the following;

- Wild Deer
- Fieldmouse
- Shrews
- Bats
- Fieldfare
- Lapwing
- Sparrow Hawk
- Red Kite
- Tawny Owl
- Goldfinch
- Bullfinch
- Hawfinch
- Chaffinch
- Yellowhammer
- Shrews
- Song Thrush
- Lesser Spotted Woodpecker
- Nuthatch
- Treecreeper
- Wren

The ancient Ghyll Beck runs next to HG3-4 Layton Lane fields and through HG3-3 and HG2-41. All sites contain protected mature trees and woodland including many Common Ash and Horse Chestnuts, both of which are under great threat from either Chalara dieback or leaf-mining moths respectively. The trees which form the boundary of HG3-4 are subject to a TPO and are under great stress from these environmental factors as it is without adding developmental pressures to them as well. Development within HG3-4 will be very exposed in the event of the ash or chestnut trees completely failing, as is feared by the Forestry Commission and the Woodland Trust. This would lead to a greater significant visual and character impact of development at this site. The same can be said of all the sites. HG3-3 has a native bluebell wood. HG3-2 is adjacent to UK BAP Priority Habitat pond with palmate newts which are also found in HG2-12.

All sites classified Grade 3 agricultural land. Rawdon's several farms are major employers in the village which has a rich farming heritage. HG2-12, HG2-41, HG3-2, HG3-3 and HG3-4 are regularly farmed with HG3-4 being used as a hay meadow. The wildlife value this contributes, as

well as the economic value for the farmer is invaluable. The farmer in question stands to lose his livelihood with the loss of this resource and the predicted impact of the ill-conceived airport link road which is proposed adjacent to HG3-4.

There are already insufficient school places and facilities in the area. The area will greatly struggle to accommodate the level of housing which is proposed. Furthermore brownfield sites ARE available elsewhere across Leeds and in areas with more capacity in its local schools and facilities. LCC Core Strategy says itself that all these must be developed before greenbelt land. These are also areas where they would undoubtedly benefit from investment and development, surely this has to be in the interests of Leeds as a city rather than relentless developing Greenbelt land because it offers developers an easier profit without having to contribute as much to the welfare and future of the communities involved.

No significant consideration has been given to geological and geotechnical conditions of the sites HG2-12, HG2-41, HG3-2, HG3-3 and HG3-4. It is in my opinion that these sites have difficult ground conditions either owing to their history as locations of mining or the significant standing surface water they regularly experience. The impact of development on these sites on local water courses and the surface water drainage system will be immense. The reduction in permeable surface area will greatly increase the risk of localised flooding during storm conditions as well as increase pressure on downstream areas and floodplains.

Highways access to all sites is dreadful. The A65 which underpins all of the sites is full and beyond capacity. The completed works to the roundabouts at Horsforth and Rodley have done little to improve matters and it is getting steadily worse as more houses are completed in the area. Concentrating more developments along A65 is unsustainable, dangerous and would be disaster for area. HG2-41 with a school would cause gridlock at ring-road. Worsened by one-point access into HG2-12, HG3-2 and HG3-3 from unsuitable Knott Lane. Limited mitigation measures. I challenge you to drive along the A65 at either 8-9:30am or 5-7:00pm, it is more parking than driving. I'll even pay your fuel costs.

There was no consultation on site HG2-12 or half of the lands allocated as part of HG3-4 prior to it being allocated to housing in Site Allocations Plan. HG2-12 was not included in Issues and Options consultation in June. Both of these issues are not in line with the requirements of the process and is therefore not legally compliant. Their inclusion should be immediately reversed from this plan and all future plans.

Finally and most worryingly the Council has not revised its housing target in response to revised Office of National Statistics projections. If it had it would mean that the city would be trying to accommodate 45,000 and not current target of 70,000. The council has based its entire Core Strategy on data which is out of date and has been proven as being incorrect. If the correct figure of 45,000 was adopted then there would be no requirement to utilise greenbelt land in this Site Allocation Plan.

I would like to confirm my desire and wish to take part in the public examination.

Kind regards,

Oliver Clarke
Senior Landscape Architect
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