

From: [REDACTED]
To: [Site Allocations Plan](#)
Subject: PDE01118_SAP Objections
Date: 15 November 2015 22:06:19
Attachments: [consultation letterRBUXTON fin.docx](#)

Dear Sir/Madam

Attached are my objections to Leeds' SAP. I have also copied them below.

Regards

Dr Robert Buxton

38 Markham Crescent, Rawdon, Leeds, LS196NG

I wish to register my objections to proposed development on all greenbelt sites in Leeds' Site Allocation Plan, including: HG2-41, HG2-43, HG2-12, HG3-2, HG3-3 and HG3-4. All six of these sites are both greenbelt and Strategic Green Infrastructure, it therefore goes against National Policy, the NPPF and Leeds' Core Strategy to develop these sites.

Paragraph 83 of the NPPF states that: "once established, green belt boundaries should only be altered in exceptional circumstances." No exceptional circumstances have been identified to build on these greenbelt sites, which should alone be sufficient for rejection of all six sites. Housing targets do not constitute exceptional circumstances, as Housing Minister Brandon Lewis made clear in parliament, on February 3rd 2015:

"Our protection of the green belt also extends to planning decisions...our planning guidance makes it clear that unmet housing need, including need for Traveller sites, is unlikely to outweigh harm to the green belt."

This is true even for correct housing targets, let alone Leeds' clearly miscalculated target, based on incorrect population growth data, as exposed by the 2011 census; it should be 44000, not 70000. Although recognised as incorrect, it will not be reviewed until 2018, and greenbelt land will be built on in the meantime (in phase 1). In any event, the housing mix should include some cheaper and smaller houses, and I see no evidence of this in the plans.

One clear objective of greenbelt is to prevent urban sprawl and the merging of separate communities. HG2-41 and HG2-12 must be protected to avoid the merging of Rawdon and Horsforth. The origins of these communities may be traced back to the 11th century (in the Domesday Book) and they may well be much older. Rawdon, where I live, still maintains an independent village identity. The NPPF states that: "the fundamental aim of green belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of green belt are their openness and their permanence". It goes on to specifically mention the five purposes of green belt, which include "to prevent neighbouring towns from merging into one another", "to check the unrestricted sprawl

of large built-up areas” and “to preserve the setting and special character of historic towns”.

In a similar vein, I object to other proposed sites which act to merge nearby Yeadon with Guiseley (HG2-2 and HG2-3), and also Guiseley with Menston (HG2-1); if the site allocation plan is approved, all these separate communities will be on course to sprawl into one.

HG2-43 hosts a nature reserve. This should be left to enhance biodiversity and, more generally, for future generations to enjoy. As the NPPF states: “Sustainable means ensuring that better lives for ourselves don’t mean worse lives for future generations”. It goes on to state we should “enhance our natural, built and historic environment” (paragraphs 133-134). What’s the point of having an NPPF, Core Strategy or a public consultation if a nature reserve in greenbelt land, which is also strategic green infrastructure, cannot be saved? The same must be asked of all greenbelt sites at risk in Leeds.

Building on HG2-43 and HG2-41 would also create traffic problems on the nearby roundabout; it has been extensively improved this autumn, but only to cope with current traffic levels, not any possible future increase. Even now, there are long queues in rush hour. This is just one example of the absolute lack of infrastructure planning for all the proposed developments, as required by the NPPF, paragraph 162.

Greenbelt should not be included at all, let alone in phase 1. There are **94 suitable brownfield sites in the SHLAA which have not been included in the SAP**. Brownfield should be developed first, then non-greenbelt greenland and hopefully never greenbelt. The exact opposite seems to be happening, despite the NPPF clearly prioritising greenbelt protection.

A common excuse for not using other brownfield sites is ‘possible contamination’. The word ‘possible’ indicates that no effort has been made to actually determine whether it is suitable or not; this should be done before using greenbelt instead. Even if a site is contaminated, there is a £1 billion government fund set aside to help the decontamination of brownfield sites; why has Leeds City Council not sought any of this money? Decontamination is a perfectly normal process. For example, former petrol stations are commonly decontaminated and built on, and yet a petrol station is just one brownfield site not included.

Returning to the point in NPPF about future generations, my whole family enjoys walking in and around greenbelt land, including HG2-41, HG2-12, HG3-2, HG3-3 and HG3-4, and this land should remain protected for my children and their children.

What’s the point of having land defined as greenbelt if we build on it as a first resort, in phase 1? It should not be included in any phase. The Core Strategy Inspector, Mr Anthony Thickett, said there should be a greenbelt review, which would have involved public consultation, yet none took place. Instead, greenbelt sites have been treated as though greenbelt legislation did not exist, and the Core Strategy Inspector has been

inexplicably ignored.

To quote the NPPF Ministerial Foreword by Greg Clark MP:

“This should be a collective enterprise. Yet, in recent years, planning has tended to exclude, rather than to include, people and communities. In part, this has been a result of targets being imposed, and decisions taken, by bodies remote from them. Dismantling the unaccountable regional apparatus and introducing neighbourhood planning addresses this.”

In the absence of a greenbelt review, the current consultation is our only chance to speak; please listen to our opinions and act on them. I would like to summarise my opinions in the following table:

Question	Answer	Reason
Have the plans been positively prepared?	No	Will build on Greenbelt and Strategic Green Infrastructure. Lack of infrastructure planning. Lack of cheaper houses in housing mix.
Are the plans justified?	No	Huge number of Greenbelt and Strategic Green Infrastructure sites included, while 94 'suitable' brownfield sites are not included.
Will the plans be effective?	No	Lack of infrastructure planning. Lack of cheaper houses in housing mix.
Is the plan consistent with National Policy and Core Strategy?	No	Will build on Greenbelt and Strategic Green Infrastructure without any 'exceptional circumstances'. Will cause urban sprawl and merging of historic communities.

Yours Sincerely

Dr Robert Buxton