

**From:**  
**To:** [Site Allocations Plan](#)  
**Cc:** [Stuart Andrew.MP](#)  
**Subject:** PDE01249\_LDF Publication Draft Consultation: Response to LCC's Site Allocation Plan  
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**Importance:** High

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From: Dr Samantha Lay, 18 Town Street, Rawdon LS19 6PU

To: LDF Publication Draft Consultation, Forward Planning & Implementation, The Leonardo Building, 2 Rossington Street, Leeds LS2 8HD

15 November 2015

Dear Sir/Madam,

**Subject: Objections to Leeds City Council Site Allocation Plan Consultation for Sites HG2-12, HG2-41, HG3-2, HG3-3, HG3-4**

As a resident of Town Street, Rawdon, Leeds, I am writing to object to the proposed residential development at the above sites in Rawdon.

Leeds City Council has asked residents for their views as to the 'soundness' of its plans and in the case of the above sites, after much research I have come to the conclusion that the sites HG2-12, HG2-41, HG3-2, HG3-3, HG3-4 cannot be justified, are not deliverable, the plans to include them are neither legally compliant nor in line with the National Planning Policy Framework, and in addition have not been 'positively prepared'.

Before I detail my objections and concerns with regards to the individual sites, I would like to say a few words about the conduct of Leeds City Council prior to and during the consultation process, and also to comment on LCC's plans as a whole.

Apparently, Leeds City Council held a consultation about its proposed plans back

in 2013. I was not aware of this and as a council tax payer and resident in Rawdon, I am frankly disgusted that LCC failed to draw attention to its plans to carve up our protected green spaces in 2013. It really begs the question, 'why would LCC want to conduct a 'silent' consultation unless they wanted as little public input as possible?

News of this current consultation process has only been widely disseminated by local residents' groups city-wide. The LCC teams sent to each location to speak to the general public/tax payers have been poorly informed, and the events themselves would have gone unnoticed had it not been for local residents trying to protect our greenbelt.

It is deeply disturbing and upsetting to find that all sites allocated by LCC in their Site Allocation Plans for Rawdon are in our precious and protected greenbelt land. But crucially, the allocation of all sites in Rawdon by LCC) are not based on a comprehensive Greenbelt Review as required by the previous Inspector when he passed LCC's Core Strategy as sound.

Therefore, this means that the selective and flawed greenbelt review undertaken by LCC makes their Core Strategy and Site Allocation Plans unsound also.

LCC's Site Allocation Plan to meet a target of 70,000 new homes is flawed because it is based on out-dated statistics. LCC neglected to revise this target in the light of revised projections from the Office of National Statistics. If LCC used the most recent figures, the housing need would be only 45,000 new homes required. A reduction in their current figures of just 15 per cent would mean that not one acre of greenbelt in Leeds needs to be sacrificed to fill the coffers of developers.

LCC has not sought alternatives for development in our area to justify the development of the Rawdon sites. I believe that releasing land from the greenbelt for development must only be in 'exceptional circumstances'. For LCC, the city's growth is the exceptional circumstance. But government Ministers disagree. I hoping that the Planning Inspector disagrees with LCC too.

I would now like to explain why LCC's Site Allocation Plans for Sites HG2-12, HG2-41, HG3-2, HG3-3, HG3-4 are UNSOUND.

### **HG2-12 Woodlands Drive**

The development of this site is unsound because it is NOT justified. The site is one designated by LCC itself as a Special Landscape Area. Development of this

site will destroy the distinctive Aire Valley views and the rural character of this area.

This site is also within the immediate setting of the historic Cragg Wood Conservation Area. Development will doubtless destroy the special nature of this beautiful and historic part of Rawdon Village.

The site is a vital part of Leeds' recreational network. Leeds Country Way runs right through it. One only wonders how this site could ever be considered as appropriate for some 130 houses.

Furthermore, this site has been designated by LCC itself as a Strategic Green Infrastructure Area.

This site is also a UK Biodiversity Action Plan Priority Habitat site and is home to a wide range of wildlife including wild deer, tawny owl, curlew, sparrowhawk, bats, palmate newts, and lapwings.

The development of this site also cannot be justified because it will result in the loss of land that is regularly farmed. To remove this land will rob several farming families in the area of their livelihoods and will kill off farming in the area.

The development of this site also cannot be justified because there have been major flaws in LCC's assessment methodology. HG2-12 has been allocated in spite of its low sustainability appraisal score of -7. This score makes HG2-12 the worst site for development compared to other sites in the vicinity.

The development of HG2-12 is NOT deliverable. First and foremost, highways access to this site is dependent upon the development of safeguarded sites at HG3-2 and HG3-3. HG3-2 and HG3-3 are phase 3 sites and not meant to be developed until at least 2028. But, problematically for LCC, HG2-12 is allocated for delivery earlier than these phase 3 sites. Therefore, HG2-12 has been erroneously included as an allocated site even though it simply cannot be delivered.

The development of HG2-12 is NOT legally compliant. It cannot be overstated that there was no consultation on site HG2-12 prior to it being allocated for housing in LCC's Site Allocation Plan. How can this be allowed?

In addition to this, site HG2-12 was not included in the Issues and Options consultation held in June 2015.

Furthermore, the development of this site is not in accordance with the National Planning Policy Framework – particularly in relation to chapter 9 Protecting Greenbelt, chapter 11 Conserving Natural Environment and chapter 12 Conserving Historic Environment.

Why would LCC choose to 'sneak' this site into its plans for consultation at the eleventh hour? I trust the Planning Inspector will get to the bottom of this murky and legally non-compliant decision.

The development of HG2-12 is unsound also because it has not been in LCC's words 'positively prepared'.

### **HG2-41 Rawdon Crematorium to Horsforth Roundabout**

There are 770 homes planned for this site. This is a shocking figure, and very worrying to myself as a local resident. This site cannot sustain this number of homes and the traffic it will bring.

The inclusion of this site is unsound because it is NOT justifiable.

Site HG2-41 is an LCC designated Special Landscape Area, an important green corridor for wildlife already under pressure from traffic and development at other sites.

The ancient Ghyll Beck runs next to this site and as such would potentially qualify it as a Local Wildlife Site. Indeed, local people are currently surveying the area with the aim of including it as an important Local Wildlife Site in West Yorkshire.

This site is also regularly farmed and its loss would mean yet another blow to the rural character of the area and the farming families who have relied on this land for their livelihoods for hundreds of years.

Development at this site on this scale will bring traffic chaos, and traffic will lead to poor health in local residents because of the increased pollution. I would not

be at all surprised to see LCC sued for failing to protect the health of residents at some point in the future if development of this site and this scale goes ahead.

### **HG3-2 Knott Lane East & HG3-3 Knott Lane West**

The inclusion of these two sites is also very distressing to local people and also demonstrative of the cavalier attitude LCC has towards its own Strategic Green Infrastructure Areas. Both these sites are designated as such.

Once again, LCC clearly thinks it can flout the UK Biodiversity Action Plan (BAP) because HG3-3 is a BAP Priority Habitat. But who can stop LCC disregarding its responsibilities in this regard? I am hoping that the Planning inspector will remind LCC of its obligations and remove this, and all sites in Leeds with BAP Priority Habitat status as this makes the planned development unjustified and do unsound.

Site HG3-2 is adjacent to a BAP Priority Habitat pond site and protected palmate newts are regularly seen here.

Ghyll Beck – the ancient boundary between Horsforth and Rawdon – runs through this site. And according to the Senior Ecologist at West Yorkshire Ecology in an email to myself, it cannot be ruled out that European otters reported in Rawdon on the River Aire are not using Ghyll Beck to travel up and down stream from the river. Otters are protected and LCC cannot be allowed to get away with breaching European and UK laws.

It is my view that all sites where Ghyll Beck runs through or is adjacent to, should be immediately removed from the Site Allocation Plans until further research to discover if otters and indeed palmate newts are using the stream as an important and rare local network. Had LCC conducted a proper Greenbelt Review I know this site would never have been added to LCC 's Site Allocation Plans. It is therefore unsound.

HG3-2 is also farmed regularly. Yet more farmland will be extracted from this area and farming will effectively disappear from Rawdon. This is unjustified.

HG3-3 is a family smallholding and has beehives. This is a rare site in Rawdon and must be protected.

### **HG3-4 Layton Lane**

For me, the inclusion of this site is personally very difficult to understand. This site is immediately adjacent to Ghyll Beck, the ancient boundary between Rawdon and Horsforth and important potential Local Wildlife Site.

The two fields proposed for phase 3 development includes plans for some 130 houses. Given that Ghyll Beck is immediately adjacent to this site, I am very fearful for the veteran trees, the rare bluebell wood, the pollution that will be caused to Ghyll Beck and the impact this will have on the River Aire, into which the beck flows.

Crucially, access to the proposed 130 new homes is very limited and the local roads would not be able to cope with the traffic that 130 new families will bring.

This leads me to question why the proposed link road to the airport is NOT being considered as part of this consultation. The link road proposes to cross the fields to the Horsforth side of Ghyll Beck (the houses are planned for the Rawdon side of the beck).

To service 130 new homes a link road would have to be provided. It all seems like a done deal, as 130 homes would be unsustainable without the proposed link road.

The Leeds Country Way runs through HG3-4 – part of LCC's own Strategic Green Infrastructure. If they have their way, LCC will destroy the Leeds Country Way completely, making a mockery of its Strategic Green Infrastructure. Therefore, this is unsound because LCC are not complying with its own policies.

Having detailed my objections to the inclusion of Sites HG2-12, HG2-41, HG3-2, HG3-3, HG3-4 in LCC's Site Allocation Plans, I would now like to conclude.

LCC has not consulted with our community effectively. Residents, myself included, feel that LCC has too readily given in to pressure from housing developers to build on our protected greenbelt without making the case for the 'exceptional circumstances' it needs to have to do so. Growth alone is not reason enough.

Furthermore, a city cannot have growth without the development of effective infrastructure to service the incoming population. Developers are promising to bankroll new roads, but where are the schools, the doctors' surgeries, and dentists?

LCC promised that it would develop brownfield first. But of course, developers do not like such sites as they are expensive to clean up and tend to be in areas where house prices do not fetch a premium.

Residents have had no details about types of housing to be built at these proposed sites, whether homes will be 'affordable' or whether social housing will also be included in the new homes.

I feel very strongly that the greenbelt, local history, and the health and happiness of local people will be sacrificed to make profits for developers and to increase council tax revenues in 'premium' areas.

Our wildlife is rich and diverse here in Rawdon. I am lucky enough to be able to watch Red Kites hunting over my garden, fortunate enough to walk down by the River Aire and see rare and protected otters. The sites proposed for housing development in Rawdon all form part of a delicate ecology, they are all interconnected and form part of a green corridor that is always under pressure. LCC's Site Allocation Plans amount to nothing more than environmental vandalism. And it is local residents, and our wildlife that will pay the price forever.

The proposed development of Sites HG2-12, HG2-41, HG3-2, HG3-3, HG3-4 is unjustified, undeliverable, not prepared positively, is legally questionable, and goes against the NPPF. It is therefore UNSOUND.

Yours sincerely,

Dr Samantha Lay

