

From:
To: [Site Allocations Plan](#)
Subject: PDE01393_Objection to proposed developments HG2-12, HG2-41, HG3-2, HG3-3, HG3-4
Date: 15 November 2015 15:14:22

Dear Sir/Madam,

I wish to object to the proposed development of the following sites:
HG2-12, HG2-41, HG3-2, HG3-3, HG3-4.

The Site Allocations Plan for the above sites is not sound, based on the following tests of soundness:

Positively Prepared

The SAP for these Rawdon sites is not based on a comprehensive green belt review as required by the previous Inspector when he passed the Core Strategy as sound. The selective green belt review undertaken by Leeds City Council means the Core Strategy and Site Allocations Plan are UNSOUND.

Effective

The phasing of HG2-12 is undeliverable. Highways access to HG2-12 is contingent on development of the 'safeguarded' sites HG3-2 and HG3-3. However, HG2-12 is allocated for delivery earlier than these phase 3 sites. It has been incorrectly categorised as 'allocated' and CANNOT be delivered.

Highways access is limited.

HG2-12: there is only one access point into the site via Southlands Avenue as the other roads are private. This access is inadequate for 130 houses. Knott Lane is barely suitable for additional development. Frequent traffic also uses Knott Lane, affecting all three sites close by.

HG2-12, HG3-2 and HG3-3: these would collectively require realignment of Knott Lane and this would still not serve them all adequately. Existing access issues onto the congested A65 would remain and worsen further with increased traffic from significant housing developments. Significant surface water flooding in HG2-12 may make the site undeliverable.

Justified

The development is not justified.

Special Landscape Area would be forever lost by spoiling the distinctive open valley views and rural character of Rawdon village and the Leeds/Bradford green corridor. All sites are in LCC's own designated *Special Landscape Area*. HG2-12 and HG2-41 would have particular visual impact.

Rawdon Cragg Wood Conservation Area would be compromised by marring its setting and views which are intrinsic to its historic character as enshrined in the Rawdon Cragg Wood Conservation Area Appraisal. HG3-3 is within the conservation area, and HG2-12 within the immediate setting of the conservation area.

Vital area of green belt would be forever lost by blurring the gap between Leeds and Bradford, encroaching into our open countryside. This is unplanned urban sprawl. Rawdon's village identity would be gone.

The Strategic Green Infrastructure of Aire Valley would be forever lost thus harming nature and ecology and restricting enjoyment of the area for walking, cycling and horse-riding. The *Leeds Country Way*, a key regional recreational route, runs through HG2-12 and alongside HG3-2 and HG3-3. All sites are indeed part of LCC's own designated *Strategic Green Infrastructure Area*.

The A65 is already very congested and over capacity with unacceptable queues at Horsforth roundabout in spite of the new traffic lights. Therefore concentrating more

developments along the A65 is unsustainable, dangerous and polluting. HG2-41 with a school would cause gridlock at the ring-road, all worsened by one-point access into HG2-12, HG3-2 and HG3-3 from the unsuitable Knott Lane. Having spoken to one of the Planning Officers on 3rd October at the drop-in session at the Mechanics Institute Horsforth, it is clear that LCC has no pre-prepared strategy for dealing with these serious traffic issues.

Wildlife habitats would be lost. HG2-12, HG3-3 and HG3-4 are *UK Biodiversity Action Plan (BAP) Priority Habitats*, hosting wild deer, bats, fieldfare, lapwing, curlew, sparrowhawk, tawny owl. 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. HG3-3 has a native bluebell wood. HG3-2 is adjacent to a *UK BAP Priority Habitat pond* with palmate newts, also found in HG2-12.

Grade 3 farmland would be lost. All sites are classified *Grade 3 agricultural land*.

Rawdon's several farms are major employers in the village which has a rich farming heritage. HG2-12, HG3-2 and HG2-41 are regularly farmed. HG3-3 is home to a family's smallholding and a bee-keeper's apiary.

There are major flaws in the methodology of assessments e.g. HG2-12 is allocated even though the sustainability appraisal scores it -7, the worst of all nearby sites. The Greenbelt Assessment shows the greatest impact compared with other sites, yet HG2-12 is allocated while nearby sites are safeguarded. Why?

Brownfield sites ARE available elsewhere across Leeds. The LCC Core Strategy says itself that all these must be developed before green belt land.

LCC has not revised its housing target in response to revised ONS projections which would mean the city needs 45,000 and not the current target of 70,000 (on which LCC based its Core Strategy). A reduction in target of just 15,000 would remove the need to take any land out of green belt.

Consistency with National Policy

This development is not in accordance with the NPPF, especially chapters 9 Protecting Green Belt land, 11 Conserving and enhancing the natural environment and 12 Conserving and enhancing the historic environment. By not considering alternatives (see above), LCC has not proved that '*exceptional circumstances*' exist to outweigh the harm that development would cause to the green belt sites here. LCC say that '*growth*' is the exceptional circumstance, but government ministers disagree.

Two of the Core Planning Principles in Section 17 of the NPPF state:

- take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;
- conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations;

These proposed developments contravene both of the above statements for reasons outlined previously.

Legally Compliant

This development is not legally compliant and not compliant with the Statement of Community Involvement.

There was no consultation on site HG2-12 prior to its being allocated to housing in the Site Allocations Plan. HG2-12 was not included in the *Issues and Options consultation* in June. I did not know that LCC held a public consultation about their plans in 2013, or that this current public consultation was happening until alerted to it by Rawdon Parish Council.

I would also like to draw attention to the following considerations in my objection:

Ecology/Landscape/Trees

Chapter 11 of the NPPF (Conserving and Enhancing the natural environment) states the following:

The planning system should contribute to and enhance the natural and local environment by:

- protecting and enhancing valued landscapes, geological conservation interests and soils;
- recognising the wider benefits of ecosystem services;
- minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

These proposed developments contravene all the above statements for the reasons already outlined earlier.

Conservation/Heritage

The statements below are all excerpts from the Rawdon Cragg Wood Conservation Area Appraisal:

- Rawdon Cragg Wood is a place of special character and historic interest.
- Ensure that future public realm and traffic management measures respect and enhance the special character of the conservation area.
- Ensure that the setting of the conservation area is considered as a material consideration within the planning process.
- Open agricultural land surrounding the conservation area adds to the spacious and picturesque character of the area.
- Open countryside surrounds Cragg Wood providing picturesque views.
- It is important that development around the conservation area does not spoil its setting. Views towards and away from a conservation area can be spoiled by inappropriately placed buildings or groups of buildings, at key locations.
- **Action: Ensure that the setting of the conservation area is considered as a material consideration within the planning process.**

The CAA also makes much of the 'arcadian feel' of the area. The open agricultural land, picturesque views, spacious character provided by HG2-12 contribute to that arcadian feel and once 'inappropriately placed buildings or groups of buildings' are in place then that part of the heritage landscape is lost forever.

I cannot see that LCC have carried out the action ('Action: Ensure that the setting of the conservation area is considered as a material consideration within the planning process') noted in their own CAA document.

Loss of Green Belt

Section 80 of chapter 9 Protecting Green Belt land states:

- Green Belt serves five purposes:
 - 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; and
 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

These proposed developments contravene all 5 of these purposes in that urban sprawl is unrestricted; neighbouring towns merge into one another (Horsforth and Rawdon); countryside is encroached upon; Rawdon loses its setting and special historic character; derelict and other urban land is not recycled.

The Planning Officer I spoke to on 3rd October at the drop-in session justified this development on green belt by saying that there's 'plenty of green belt left'. This is not a justification and moreover will cease to be true before long if LCC continues with this lax attitude to building on green belt. Part of Leeds' appeal is its green open spaces. Every effort should be made to retain these for future generations to prevent Leeds from becoming just another concrete jungle.

I would like to be kept informed of the date of the Public Examination.

Yours faithfully,
Jo-Anne Morgan
Fairholme
Woodlands Drive
Apperley Bridge
BD10 0PP