

From: .
To: [Site Allocations Plan](#)
Cc: [Stuart Andrew.MP](#)
Subject: PDE01451_Housing Development Consultation - objections. Site references: HG2-9; HG2-10; HG2-12; HG3-2; HG3-3; HG3-4; HG2-41; HG2-43
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Housing Development Consultation - objections. Site references: HG2-9; HG2-10; HG2-12; HG3-2; HG3-3; HG3-4; HG2-41; HG2-43

I am writing in my capacity as co-owner of Wren Cottage, 1 Low Fold, Rawdon, Leeds LS19 6DE, a property which I have owned for circa 14 years. I have however lived in Leeds for the last 60 years or so much of it in or around Rawdon. My wife is the co-owner of Wren Cottage and rates are paid by us on that property.

Rawdon is an extremely pleasant village in which to live with its own unique and special character. I am therefore extremely concerned at the proposals of Leeds City Council (LCC) for Rawdon village and surroundings. In particular my concern is at the proposal to build circa 2,300 + new homes in Aireborough, an area which I understand is roughly from the boundary of Rawdon with Horsforth to the Fire Station at Menston and which encompasses areas of Rawdon village, Yeadon, Hawksworth village and Guiseley. This is in addition to over 2,000 more houses in Horsforth and 4300 more in nearby Bradford villages and towns. Whilst my principal concern relates to the village of Rawdon the effect of planning decisions on neighbouring towns and villages obviously impacts on Rawdon, particularly in terms of villages/towns merging into one another. If that were to happen Rawdon would in reality no longer be a village with its own characteristics but would merge into a 'large town/city' which is totally different to where I and other Rawdon residents purchased a home. If I wanted to live in a large town/city I would have purchased a home in such a place! The proposals of LCC through its Site Allocation Plan would be detrimental to Rawdon, and the lifestyle which attracts people to it and is I believe inconsistent with the conservation status of the village. Put bluntly it is unsustainable vandalism.

As I understand matters the proposals of LCC means that almost all the houses would be built on Greenbelt, with the result that Yeadon and Guiseley would join together and similarly Guiseley would then join with Menston. Where is the unique identity of these places going? There has already been significant development in the immediate area, an area which is already extremely 'over stretched' and very close to losing what attracted people to it in the first place. The area already has too few Doctors and Dentists and the roads are congested to the point of lengthy traffic jams and gridlock, and there is also a serious parking issue. The A65 is particularly bad and has not been improved by significant investment in Roads. It is one of the busiest roads in and out of Leeds. The airport is increasing traffic on the A65 and the A65 needs significant improvement to ease the problems. The only real option to improving the A65 and the traffic situation in General appears to be road widening and I simply don't know where the land can come from for such wholesale widening. Land is simply not available along the length of the A65. The other alternative is an airport relief road but that will not solve all the problems of the A65. As a main arterial route it simply cannot cope, with or without a relief road.

I would question the soundness of the proposals of LCC. I believe that there are four main areas in relation to soundness:

1. Is the choice of site **justified** ie is it the most appropriate when compared with the alternatives;
2. Is it **effective** ie can it be delivered;
3. Does it agree with the Policies of the **National Planning Policy Framework** (NPPF);
4. Is it **positively prepared** ie does it agree with the policies in the core Strategy and is it legally compliant

In my view LCC fail under **ALL** of the above four main areas of soundness.

1. DEVELOPMENT NOT JUSTIFIED

In relation to 1 above the proposed development is not justified for a number of reasons. In particular:

Special Landscape Area forever LOST

By spoiling distinctive open valley views and rural character of Rawdon village and Leeds/Bradford green corridor. All sites are within LCC's own designated special landscape area. **HG2-12** and **HG2-41** would have particular visual impact.

Rawdon Cragg Wood conservation area LOST

By marring its setting and views which are intrinsic to its historic character as enshrined in the Cragg Wood conservation area appraisal. **HG3-3** is within the conservation area and **HG2-12** within the immediate setting of a conservation area.

There has been **no comprehensive Greenbelt review** as required under Core Strategy.

Vital area of Greenbelt forever LOST

This would lead to a blurring of the gap between Leeds and Bradford encroaching into our open countryside. This is nothing less than unplanned urban sprawl. Rawdon's village identity would be gone and could never be brought back. This is applicable to all sites in Greenbelt.

Strategic Green infrastructure of the Aire Valley forever LOST

Consequently this would restrict enjoyment of the area for recreational activities such as walking, cycling, horse riding etc and harming nature and ecology. Leeds Country Way runs through **HG2-12** and alongside **HG3-2** and **HG3-3**, a key recreational route. All sites are part of LCC's own designated Strategic Green Infrastructure Area

A65 FULL and overcapacity

Concentrating more developments along the A65 is completely unsustainable, dangerous and would be a disaster for the area. The A65 is without doubt one of the busiest roads in Leeds. Commuter

traffic from as far away as Skipton drives through Rawdon daily. The ridiculous amount of development in Aireborough has brought in over 2,000 new homes over 15 years and many of the people living in those homes work in Leeds. As traffic has increased so too have crossings, traffic light controlled junctions and these just slow traffic down. Local retail parks attract large numbers of cars and the arrival of a major employer in Rawdon has seen its own parking issues.

HG2-41 with a school would cause increased gridlock at Ring Road which is already gridlocked for large parts of the day, an absolute nightmare and an area which I try at all costs to avoid. Worsened by one point access into **HG2-12**, **HG3-2** and **HG3-3** from unsuitable Knott Lane. Limited mitigation measures. The short stretch of the A65, which Low Fold feeds onto, ie the stretch from Rawdon Traffic Lights (near Micklefield Park) and JCT roundabout (near Trinity Church) gets worse by the day, due to the sheer volume of traffic which is in turn exacerbated by cars parked at both sides of the road. Parking simply cannot be justified on such a major road. My wife has already written to LCC about the dangers but essentially their attitude is that there needs to be several fatalities before they will consider taking any action. Since she wrote to LCC the situation has worsened. It is impractical to attempt a right turn out of Low Fold due to parked vehicles obscuring visibility but if cars are parked on both sides of the road (which is the norm for large parts of the day) even a left turn is not without danger. It is not simply a case of checking to the right it is also necessary to check to the left because vehicles in that direction are further out in the road due to parked vehicles and traffic is often held up because of these vehicles, which further restricts the flow of traffic on a major Road. That traffic will only increase with further additional housing in the area.

Wildlife habitats LOST

HG2-12, **HG3-3** and **HG3-4** are UK biodiversity action plan priority habitats hosting wild deer, bats, fieldfare, lapwing, curlew, sparrow hawk, 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 established woodland. **HG3-3** has a native bluebell wood. **HG3-2** is adjacent to UK biodiversity action plan priority habitat pond with palmate newts, also found in **HG2-12**

Grade 3 farmland LOST

All sites classified grade 3 agricultural land. Rawdon's several farms are significant 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 small holding and a bee keepers apiary

Basic errors in LCC's site sustainability and Greenbelt assessments for all sites

Major flaws in methodology of assessments, for example **HG2-12** has been allocated even though sustainability appraisals score it -7, which is the worst of all nearby sites. Greenbelt assessment shows greatest impact compared with other sites. Nevertheless **HG2-12** is allocated while nearby sites have been safeguarded. This has not been explained/justified.

School places

Already there are not enough school places with local schools heavily over-subscribed

Potential alternatives have been overlooked

North East Bradford

Has LCC worked with Bradford Council to consider a joint plan for bordering towns/villages

Brownfield sites

Such sites are available elsewhere across Leeds. LCC's own Core Strategy says itself that all these must be developed **BEFORE** Greenbelt land.

LCC has not revised its housing target

LCC set a target of 70,000 new homes by 2028 consisting of 66,000 planned sites with an extra 4,000 unplanned sites. This is based on out of date statistics, a fact of which LCC is well aware based on more recent statistics as provided by the 2011 census. That census shows that the population is only likely to grow by 64,000 **PEOPLE** over the same period. More recently the National Housing Federation identified a shortfall of housing built in the last 4 years of 516,510 homes. The Government confirmed that building 1 million new homes by 2020 would be considered a success. Leeds fair share of that based on population size would be 2974 homes per annum giving a 15 year target of 44610.

The NPPF states (paragraph 153) 'each Local Planning Authority should produce a local plan for its area which can be reviewed in whole or in part to respond flexibly to changing circumstances. LCC's Core Strategy states that ".....underpinning these broad objectives and supported by the Core Strategy evidence base, is the desire to respond to current and emerging population pressures and associated needs across the District"

It is my view that the use of obsolete housing target figures, although already approved, is inconsistent both with NPPF and the Council's own Core Strategy.

In summary and in response to revised ONS Projections Leeds needs substantially less housing - circa 45,000 and not the current target of 70,000 which is the target upon which the Council based its Core Strategy. A reduction in target of 15,000 would remove the need to take **any** land out of Greenbelt.

2. DEVELOPMENT NOT EFFECTIVE

Phasing of HG2-12 **UNDELIVERABLE**

Highway access to **HG2-12** is contingent on the development of 'safeguarded' sites (**HG3-2** and **HG3-3**) but **HG2-12** is allocated for delivery earlier than these **HG3** phase sites. It has been incorrectly categorised as 'allocated' and **CANNOT** be delivered

Highways access **LIMITED**

HG2-12 - there is only one access point into the site via Southlands Avenue, which is inadequate for 130 houses. Other roads are private. Knott Lane is barely suitable for additional development. It is a lane frequently used by crematorium traffic and affects all three sites close by.

HG2-12, **HG3-2** and **HG3-3** would collectively require realignment of Knott Lane but would not serve them all adequately. Access issues onto the already congested A65 would remain and would further deteriorate with increased traffic from significant housing development.

Significant surface water flooding in **HG2-12** may make the site undeliverable

3. DEVELOPMENT NOT IN ACCORDANCE WITH THE NPPF

In particular LCC's proposed development does not comply with chapters 9 (protecting Greenbelt), chapter 11 (conserving natural environment) and chapter 12 (conserving historic environment)

By not considering alternatives LCC has not proved that exceptional circumstances exist to outweigh the harm that development would cause the Greenbelt sites they propose to develop. LCC seek to aver that 'growth' is the exceptional circumstance, but Government Ministers do not agree.

Looking at the proposals of LCC in terms of the National Planning Policy Framework and the Leeds Core Strategy there are many references to 'Green Belt' in the NPPF. In particular it is referred to in the introduction and at several points in the document and also includes a whole section specifically in relation to Greenbelt land. It states:

The Government attaches great importance to Greenbelts - the fundamental aim of Greenbelt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Greenbelts are their openness and their permanence

In my opinion LCC's proposed use of large sections of local Greenbelt are inconsistent with the above.

The NPPF goes onto state

Greenbelt 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

To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

LCC's use of local Greenbelt sites ignores many of the above purposes and is therefore inconsistent with national policy. Indeed LCC has in preparing its site allocation proposal completely disregarded the fifth purpose referred to above, and this complete disregard makes the whole process inconsistent with the NPPF

The NPPF starts by stating "the general extent of Greenbelts across the country is already established ...". And then goes onto state "as with previous Greenbelt policy, inappropriate development is, by definition, harmful to the Greenbelt and should not be approved except in very special

circumstances".

I do not consider that there are any very special circumstances and on the contrary the Housing Minister (Brandon Lewis) did earlier this year (3rd February 2015) state "unmet housing needs should not exceed maintaining the Greenbelt and this is put forward in the NPPF".

On the basis of the above the use of Greenbelt to meet housing numbers is inconsistent with national policy. LCC has not in my opinion justified the exceptional circumstances necessary to build over Rawdon Green fields. Local concerns about how our roads, schools, medical centres, wildlife, recreational spaces such as parks, transport, will cope with major housing developments have not been properly addressed. The area is at capacity now and that is already detracting from the special character of the village of Rawdon.

Chapter 11 of the sustainable development section of the NPPF States

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

Protecting and enhancing valued landscapes

Recognising the wider benefits of ecosystem services

Minimising impacts on biodiversity

The use of several of the proposed sites is totally inconsistent with this aspect of national policy"

Leeds Core Strategy (LCS)

The NPPF requires local authorities to produce 'Local plans' for development. The Core Strategy is at the heart of Leeds Local Plan. In its glossary it defines Green Belt as follows:

'A designation for areas of open land around certain cities and large built up areas where strict planning controls apply to keep this land permanently open or largely undeveloped'

It also restates the five purposes of Green Belt (as per the NPPF)

Section 1.8 of the Core Strategy states:

Key priorities therefore include: planning for the provision of homes and jobs in sustainable locations, respecting local character and distinctiveness in the delivery of the Plan's objectives and maximising opportunities to recycle previously developed land whilst minimising Greenfield and Green Belt release, in planning for longer term growth

Page 60 of Leeds Core Strategy under paragraph 4.11 contains a map of Leeds Greenbelt which shows that many of the sites proposed for housing allocation (including those above) are in Greenbelt.

Page 78 of Leeds Core Strategy, headed 'key diagram', is a map identifying 'Strategic Green infrastructure'. Many of the proposed sites conflict with this.

On the basis of the above it is my strong view that not only is the site allocation inconsistent with national policy but is also inconsistent with LCC's own established policy.

Housing Target Numbers

LCC set a target of 70,000 new homes by 2028 consisting of 66,000 planned sites with an extra 4,000 unplanned sites. This is based on out of date statistics, a fact of which LCC is well aware based on more recent statistics as provided by the 2011 census. That census shows that the population is only likely to grow by 64,000 PEOPLE over the same period. More recently the National Housing Federation identified a shortfall of housing built in the last 4 years of 516,510 homes. The Government confirmed that building 1 million new homes by 2020 would be considered a success. Leeds fair share of that based on population size would be 2974 homes per a mum giving a 15 year target of 44610.

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It is my view that the use of obsolete housing target figures, although already approved, is inconsistent both with NPPF and the Council's own Core Strategy.

4. DEVELOPMENT NOT POSITIVELY PREPARED AND NOT LEGALLY COMPLIANT

Site allocation plan for these Rawdon sites are **NOT** based on a comprehensive Greenbelt review as required by previous inspector when he passed Core Strategy as sound.

The Selective and flawed Greenbelt review undertaken by LCC means that it's Core Strategy and Site Allocation Plan are **UNSOUND**

No consultation on site **HG2-12** **PRIOR** to it being allocated to housing in the Site Allocations Plan.

HG2-12 was not included in Issues and Options consultation in June.

Not compliant with statement of community involvement

I was not aware that LCC held a public consultation about their plans in 2013 - how was it publicised? Additionally I was not aware of this current public consultation until local residents began placing banners at their properties. How was this current public consultation publicised? Are LCC trying to do 'secret public consultations'??

If LCC gets it wish to build upon greenbelt Rawdon and surrounding villages will be lost forever and our lovely village will just become a concrete housing estate with no unique character. Does being in a conservation area count for anything? What is the point of conservation areas if they are surrounded by urban jungles? What do future generations have to look forward to – house after house after house, with no green spaces for amenity and recreation and an infrastructure which cannot cope now let alone in the future. Come on LCC THINK is this what you really want for the future? Please **Listen** to local people affected by what you want to do.

Thank you.

COLIN G HEDLEY

Co-Owner – Wren Cottage, 1 Low Fold, Rawdon, Leeds LS19 6DE