

**From:**  
**To:** [Site Allocations Plan](#)  
**Cc:**  
**Subject:** PDE01556\_Public consultation on Leeds SAP HG2-12, HG2-41, HG3-2, HG3-3, HG3-4  
**Date:** 14 November 2015 20:42:01

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**PLEASE ACKNOWLEDGE RECEIPT OF THIS EMAIL**

Mr James Stirk  
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To Whom It May Concern:

I am writing in regards to **LCC's Site Allocation Plan (SAP)**

The sites that concern me are HG2-12, HG2-41, HG3-2, HG3-3, HG3-4 with others sites in the area also of concern as they add to some of the problems.

Site Allocation Plan Issues

**HG2-12, HG2-41, HG3-2, HG3-3, HG3-4**

The allocation of housing to these sites is **unjustified** due to other options not being looked into and considered for housing in accordance with **National Planning Policy Framework (NPPF)**. The main areas of **NPPF** considered here are **Chapter 9 Protecting Greenbelt, Chapter 11 Conserving Natural Environment and Chapter 12 Conserving Historic Environment**. This shows that **exceptional circumstances** have **NOT** been met, and the argument from LCC that **growth** is an exceptional circumstance is incorrect, therefore the exceptional circumstance argument fails.

LCC's **Core Strategy** states that Brownfield Sites, that **ARE** available in Leeds, must be developed before greenbelt land. I believe this is a legal requirement? 97% of developments in Rawdon are on greenbelt land when it should not be. This greenbelt land will be lost forever if this **unjustified** SAP is allowed to go ahead.

The developments are **unjustified** due to a **Comprehensive Greenbelt Review** not being done as required under LCC's **Core Strategy**. The previous inspector required this to be done under **Core Strategy** rules. The current **greenbelt review** is **flawed** and **selective**, meaning that the **Core Strategy** and **SAP** are **unsound**. The whole current **SAP** needs to be started again with all guidelines being followed this time.

If a comprehensive review had been done, as required, it would have shown that many areas of greenbelt will be lost and destroyed **forever** for **flawed** reasoning, ruining open valley views, rural character and the whole areas character, this should not happen especially when most sites fall within LCC's **Special Landscape Area**. **HG2-12** and **HG2-41** developments would have a particular visual impact.

**HG3-3, HG2-12 Rawdon Cragg Wood Conservation Area - LOST** HG3-3 is within this conservation area and HG2-12 is within the immediate setting of this conservation area. We use these woods for walking and helping exercise my disabled son. He finds this very therapeutic and it has helped improve his health. Many others we meet in the woods use these woods for exercise, walking their dogs, spotting wildlife and teaching their children about the local environment. It would be a great loss to many people in the area.

**HG2-12, HG2-41, HG3-2, HG3-3, HG3-4 Vital areas of greenbelt - LOST** These allocations encroach on the countryside with urban sprawl meaning Rawdon's individuality will go. All these sites are on greenbelt, (97% of all developments in Rawdon are on greenbelt) which shows no alternatives and/or Brownfield sites have been looked into.

**HG2-12 HG3-2 HG3-3 Strategic green infrastructure of Aire Valley - LOST** This will harm nature, and areas for walking, cycling, horse riding, dog walking etc. We use these areas for exercising and as previously mentioned exercising my son in a peaceful environment. **Leeds Country Way** runs through HG2-12 and alongside HG3-2 and HG3-3, this is a vital regional recreational area with all sites being part of LCC's own designated **Strategic Green Infrastructure Area**.

**HG2-12 HG3-2 HG3-3 Wildlife Habitats - LOST** HG2-12 HG3-2 HG3-3 are all **UK Biodiversity Action Plan (BAP) Priority Habitats**. These host wild deer, bats, fieldfare, lapwing, curlew, sparrowhawks, tawny owls to name but a

few. It is amazing that LCC can consider building on sites with animals like these around. The **Ancient Ghyll Beck** runs next to HG3-4 and through HG3-3 and HG2-41. All sites contain **protected** mature trees and woodland that will be lost to development, it is naïve to think that the developers will not remove or damage these. HG3-3 has a native Bluebell Wood and HG3-2 is adjacent to a **UK BAP Priority Habitat Pond** containing Palmate Newts. Palmate Newts have also been found in HG2-12.

**HG2-12 HG2-41 HG3-2 HG3-3 Grade 3 Farmland - LOST** Rawdon will lose this farmland and Rich Farming Heritage and people in the area **WILL** lose jobs. HG2-12, HG2-41 and HG3-2 are all regularly farmed. HG3-3 is home to a small family small holding and a bee keeping apiary. These will also be destroyed if the **unjust** and **unsound** developments go ahead.

All the above shows **basic errors** in LCC's **Site Sustainability** and **Greenbelt Assessments**.

Developments are **unjustified** as there are **major flaws** in LCC's procedures and in **ALL** of their assessments. **HG2-12** has been allocated for housing even though its **sustainability appraisal score** was **-7**, the worst of all nearby sites and the **Greenbelt Assessment** shows the greatest impact compared with other sites, yet it has still been allocated for housing.

Developments are **unjustified**. LCC have ignored **ONS Projections** that states Leeds needs **45000 houses, not 70000**. **Core strategy** was based on **70000** meaning the **SAP** is **not effective** and should be reviewed, the project scrapped and started again.

**HG2-12** is also **not effective** and **undeliverable**. If LCC had held a consultation regarding this site **PRIOR** to allocating housing to it on LCC's **SAP** this would have been known. It was **NOT** included in the **Issues and Options Consultations** in June and is **not legally compliant** with **Statement of Community Involvement**. Are there any public consultation happening at the moment regarding this site before the **SAP** deadline? Any consultations that have already happened have been poorly advertised so that the **SAP** can move ahead without any problems, this is **unjustified**.

**HG2-12** is **undeliverable** because it is assuming that safeguarded sites **HG3-2** and **HG3-3** are developed for **highways access**. **HG2-12** is allocated for delivery before these sites, therefore it can **NOT** be delivered.

Roads and Transport

## **HG2-12, HG2-41, HG3-2, HG3-3, HG3-4**

**HG2-12** as discussed is dependent on **HG3-2** and **HG3-3** and there is only one access point via Southlands Avenue as all other roads are private. Knott Lane is **not suitable** for development. Frequent funeral traffic from the crematorium is already bad enough down there anyway and these cars can't get onto gridlocked A65, if **HG2-12, HG3-2** and **HG3-4** are developed, it would not only require a re-alignment of Knott Lane but make the traffic worse. Has a traffic survey been done on Knott Lane? If it has it would surely show that it is unsuitable.

Putting more developments on the **A65** and by Horsforth Roundabout is unsustainable, very dangerous for traffic and pedestrians alike and will affect local businesses. **HG2-41** would make matters worse with the school being built adding more traffic to Horsforth Roundabout at peak times.

I often have to go to Pudsey to take care of my niece and the traffic is terrible at all times of the day, adding up to 45 minutes to my journey.

Traffic flow assessment for the area is **flawed**. Data collected is **inadmissible**, it was collected mainly during half term and before Horsforth Roundabout and Rodley Roundabout were developed meaning it is **unsound**. The problems affecting these areas after the development means traffic surveys need doing again before **SAP** allocations can go ahead.

Parking in Rawdon is awful and **HG2-12, HG2-41, HG3-2, HG3-3, HG3-4** will only make it worse. Have these problems been considered before SAP allocation? It is dangerous in certain areas to park and cross roads, I worry for the safety of pedestrians in the area.

Although I have a drive to park on, parking is so bad in the area that people have to park on a blind bend on the brow of the hill, this makes it extremely dangerous and we have been very lucky not to be hit when exiting our driveway.

Traffic congestion and parking will be made worse due to LCC ignoring **government guidelines** and **ONS** recommendations and wanting to build **70000 houses instead of the 45000**.

### Schools

## **HG2-2, HG2-41, HG3-2, HG3-3, HG3-4**

Local schools cannot cope, they have been full for a long time, the addition of so many houses is only going to make it worse.

One school on **HG2-41** will in no way solve all these problems. Children will still have to travel to other schools adding to congestion and further overcrowding. This will not only affect the education of local children, it will also make the parking situation even worse.

This will also make the congestion at Horsforth roundabout unbearable during rush hour.

I also fear for the safety of school children, the school traffic makes crossing roads a nightmare for them and I fear an accident will happen, extra traffic will make it even worse.

### Medical

#### **HG2-12, HG2-41, HG3-2, HG3-3, HG3-4**

The current medical system cannot cope either. It is almost impossible to get an appointment with my doctor of choice and with my current health problems and those of my disabled son who needs regular treatment, this is not acceptable, this will only get worse.

The parking situation also causes massive problems here, people are having to park anywhere possible even if this means private car parks. The parking situation and people having to use private car parks as there is no other choice means I have to park a long way from any medical institution we are attending and having an ambulatory disabled son, this is a serious problem as he cannot walk these distances.

Dentists are the same, I doubt that any new people moving into the area will find a dentist, therefore being unfairly forced to go private.

### Businesses

## HG2-12, HG2-41, HG3-2, HG3-3, HG3-4

Local businesses are suffering a drop in customers mainly due to traffic congestion, people can't or won't go out to these places due to the hassle of driving and parking in the area. This will only get worse when new houses are built as there is no parking to shop. This has been seen to affect new and well established businesses. Due to it being almost impossible to park anywhere, I have had to start internet shopping, I would love to shop local but can't, meaning a loss of business for local shops.

### Rawdon Crematorium

## HG2-41 HG3-3

It is appalling that these two sites are to be built partially on the sacred grounds of Rawdon Crematorium. My first wife, my parents, family and friends have all had their ashes spread on these grounds and have dedications there. I find this plan upsetting and quite frankly disgusting. If I am not able to visit them, I don't know what I will do and the thought that the ground where their ashes have been spread is going to be taken is extremely upsetting. It is absolutely disgusting that houses has been allocated here!!!

How can this be allowed to happen when LCC have not followed **Core Strategy** and **NPPF** in allocating to Greenbelt before Brownfield and failing to look for alternatives?

### Conclusion

## HG2-12, HG2-41, HG3-2, HG3-3, HG3-4

All these developments are **unjustified, not effective, not legally compliant, not positively prepared and not in accordance with NPPF.**

**Flawed** and **basic errors** have occurred throughout this project, LCC has gone against its own **Core Strategy, Government Policy**, ignored **ONS** statistics and failed to complete a required **Comprehensive Greenbelt Reviews**.

**Over development by 25000** and choosing to build on **Greenbelt instead of Brownfield** sites and without looking at **alternatives**, shows LCC are acting outside guidelines and should be forced to restart the project.

If these developments go ahead, communities will be ruined, greenbelt lost, countryside ruined, habitats gone and in general difficult and worrying times will be ahead for all of us who live in the area. Once development has started, a once lovely rural area will be destroyed for all the wrong reasons, with the encroachment on to the grounds of Rawdon

Crematorium being an absolute disgrace.

I would be willing to take part in the forthcoming public examination and I would also like to be notified of the submission of plans for public examination and the adoption of plans.

If you need to contact me regarding this, my details are as follows.

Mr James Stirk

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Kind regards,

James Stirk