

From:
To: [Site Allocations Plan; hello@rgag.org.uk](mailto:hello@rgag.org.uk)
Subject: PDE01594_Public consultation on Leeds SAP HG2-12, HG2-41, HG3-2, HG3-3, HG3-4
Date: 14 November 2015 16:40:14

Mrs Nicole Cowburn

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To Whom It May Concern:

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

The sites I am concerned about are HG2-12, HG2-41, HG3-2, HG3-3, HG3-4 with others in the area being affected and in turn affecting these.

Site Allocation Plan Failures

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

Allocation of housing to these sites is **unjustified** as other options have not been looked into and considered 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 with LCC claiming **growth** is an exceptional circumstance, it is not, the exceptional circumstances argument fails

LCC's **Core Strategy** says Brownfield Sites that **ARE** available in Leeds must be developed before greenbelt land. 97% of development in Rawdon is on greenbelt when it need not be. This greenbelt land will be lost forever and cannot be allowed to happen, it is **unjustified**.

The developments are **unjustified** as a **Comprehensive Greenbelt Review** was not done as required under LCC's **Core Strategy**. The previous inspector demanded that this been done under **Core Strategy** rules. The **greenbelt review** is **flawed** and **selective**, meaning that the **Core Strategy** and **SAP** are **unsound** and needs to be done again from scratch.

If a comprehensive review had been done it would show that many areas of greenbelt will be lost and destroyed **forever**, 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 particular visual impact.

HG3-3, HG2-12 Rawdon Cragg Wood Conservation Area - LOST HG3-3 is within the conservation area and HG2-12 is within the immediate setting of the conservation area. We use these woods for walking and dog walking. Many others we meet in the woods and know in the area do the same and it would be a big loss. I also take my disabled brother around the area for exercise that is vital to his wellbeing.

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 Rawdons individuality will go. All sites are in greenbelt, which shows no alternatives and Brownfield sites have **NOT** been looked at.

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 exercise and dog walking as do many others.. **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 astonishing 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. 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 its 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** developments go ahead.

Ignoring the afore mentioned shows **basic errors** in LCC's **Site Sustainability and Greenbelt Assessments**.

Developments are **unjustified** as there are **major flaws** in LCC's procedures in **ALL** of their assessments. **HG2-12** has been allocated as a site 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 is still allocated!!!

Developments are **not justified**. LCC have ignored **ONS Projections** that stated that Leeds needs **45000 houses, not 70000**. **Core strategy** was based on **70000**, this means that the SAP is **not effective** and should be reviewed, if not started afresh.

HG2-12 is also **not effective** and **undeliverable**. If LCC had held a consultation on 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 before the SAP deadline? Any consultations that have happened have been so poorly advertised, in my belief deliberately, 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 dependant on **HG3-2** and **HG3-3** and there is only one access point via Southlands Avenue as 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.

Putting more developments on the **A65** and by Horsforth Roundabout is unsustainable, very dangerous for traffic and pedestrians and would affect local

businesses. **HG2-41** would make matters worse with the school being built adding more traffic to Horsforth Roundabout at peak times.

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 seen after this means it all needs doing again before SAP allocations can go ahead.

The traffic problems after the recent roundabout developments have caused massive problems for my business, it has often made me late for appointments as my business is mobile, affecting me financially. This will only be made worse once the Clariant site is completed and if these developments go ahead, I dread to think how bad it will be. These sites cannot be considered alone, in regards to traffic flow, as other developments in the area will only add to the problem.

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.

There are times when it is that bad that I sometimes have to park a quarter of a mile away from my house and if I am unlucky enough to arrive home when the schools are finishing, it is almost impossible to find a parking spot anywhere, it is a disgraceful situation.

Traffic congestion 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. Some children will 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.

I also fear for the safety of school children, the school traffic makes crossing roads a nightmare for them and I already 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 often taking two weeks, 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. I recently missed a vital appointment as I was forced to park approximately 600 metres on my fourth attempt. This made me late for my appointment and has resulted in a delay to my treatment.

Dentists are the same, I have had to go private at expense to myself, 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 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.

As previously mentioned, I have already been affected financially, as my business is mobile and the traffic congestion has caused me to be late or miss appointments. This will only get worse and I worry about the future of my business.

Rawdon Crematorium

HG2-41 HG3-3

It is disgraceful that these two sites are to be built partially on the sacred grounds of Rawdon Crematorium. My mum, 2 sets of grandparents, and other family and friends have dedications on these grounds and I find this plan upsetting and believable. If I am not able to visit them, I don't know what I will do. It is absolutely disgusting that houses have been allocated here, on the sacred grounds where peoples ashes have been spread!!!

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?

Would LCC allow houses to be built on or next to the graves of their loved ones?

Conclusion

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

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

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

Over developing 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 a lot of those in the vicinity of these developments. 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 a particular 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 Nicole Cowburn

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Kind regards,

Nicole Cowburn
Sent from my iPhone