

**From:**  
**To:** [Site Allocations Plan](#)  
**Subject:** PDE01600\_Public consultation on Leeds SAP HG2-12, HG2-41, HG3-2, HG3-3, HG3-4  
**Date:** 14 November 2015 16:29:49

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PLEASE ACKNOWLEDGE RECEIPT OF THIS EMAIL

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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 mainly concerned about are HG2-12, HG2-41, HG3-2, HG3-3, HG3-4 with others in the area being affected and 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 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, and therefore 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.

The developments are **unjustified** as a **Comprehensive Greenbelt Review** has not be done as required under **Core Strategy**. This 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 scrapped and started from scratch following all the rules that apply.

If a comprehensive review had been done it would show that many areas of greenbelt will be lost **forever** and destroyed forever, ruining open valley views, rural character and the areas character, this should not happen especially when most sites fall within LCC's **Special Landscape Area**. **HG2-12** and **HG2-41** development 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 do the same and it would be a big loss to the community.

**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 on 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 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. 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.

Ignoring 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 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** as LCC have ignored **ONS Projections** who stated that Leeds needs **44600 houses, not 70000**. **Core strategy** was based on **70000**, this means that the SAP is **not effective** and should be reviewed.

**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 **Issues and Options Consultations** in June and is **not legally compliant** with **Statement of Community Involvement**. Is there any public consultation happening at the moment regarding this before the SAP deadline? Any consultations are 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 already added 45 minutes to my journey to and from work. 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.

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 44600.

### 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, having to wait about 2 weeks most of the time.

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. I cannot call in at a shop on the way home from work, there is nowhere to stop, and this has led to businesses closing and I fear more will follow.

### Rawdon Crematorium

#### **HG2-41 HG3-3**

It is disgraceful that these two sites encroach on to the sacred grounds of Rawdon Crematorium. I have family and friends with dedications on these grounds and find this upsetting and believable. If I am not able to visit them, I don't know what I will do. It is appalling!!!

How can this be allowed when LCC have not followed **Core Strategy** and **NPPF** in allocating to Brownfield sites first 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 25400 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 particularly galling.

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:

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Yours Truly,

Jason Cowburn

Sent from my iPhone