

**From:**  
**To:** [Site Allocations Plan](#)  
**Subject:** PDE01607\_LSAP & AVLAAP - FORMAL OBJECTIONS MADE DURING PUBLIC CONSULTATION  
**Date:** 14 November 2015 16:12:02

---

LDF Publication Draft Consultation,  
Forward Planning & Implementation,  
Leonardo Building,  
2 Rossington Street,  
Leeds LS2 8HD

14/11/15

RE: LSAP & AVLAAP - FORMAL OBJECTIONS MADE DURING PUBLIC CONSULTATION

Dear Sirs,

We wish to make you aware of a number of strong objections that we have with regard to the proposed development of greenbelt and green field sites

HG2-41 (4240) - Fields South of A65 from Horsforth & Rawdon RA to crematorium

HG2-42 (1016) - Fields at Broadway and Calverley Lane, Horsforth

HG2-43 (5009) - Fields at Horsforth College Campus

As a local resident living close to the sites of proposed development, we are of the view that the proposed developments on greenbelt protected land will have a serious negative impact on our standard of living and should be excluded from the plans. Our specific objections are as follows:

1. Inconsistent with National Planning Policy Framework:
  - I. INADEQUATE ENVIRONMENTAL CONTSTRAINT: NPPF now states that the target level of housing development within the plans should be capped in line with the capacity of brown field sites to accommodate it, to protect and enhance greenbelt. The current plans significantly exceed this capacity; resulting in the permanent and unnecessary destruction greenbelt, which must be protected.
  - II. NON-EXCEPTIONAL CIRCUMSTANCE: NPPF states that greenbelt is to be protected and requires 'exceptional' circumstances to be built on. There is nothing exceptional about the council's plans to build on unspoilt land to meet their current housing target. The council's adoption of the self imposed Core Housing Strategy cannot be considered to be an exceptional set of circumstances, but is merely part of their scheduled housing building policy plan.
  - III. PRIORITISATION OF GREENEBLT OVER BROWN FIELD: NPPF states that brown field sites are to be prioritised over the development of green field and greenbelt, but these plans offer up greenbelt in advance. The range of larger sites such as HG4-42 are all scheduled for phase one; in advance of many brown field which are allocated for housing. The greenbelt allocated for housing has also been selected in favour of all of the other available brown field land from across the region, which must first be included in the site allocation plan.

IV. **LOSS OF COMMUNITY IDENTITY:** NPPF states that merging of communities is to be prevented, yet development of these greenbelt sites will lose the individual identities currently held between the areas in which they are located. For example, the three sites identified above currently act as the dividing space between the conurbations of Horsforth, Rawdon and Rodley. If they are to house over 1,000 new properties as suggested, the urban sprawl will knit these areas together resulting in a loss of individual community identity.

V. **LACK OF INFRASTRUCTURE:** NPPF states that infrastructure must come first, yet the outline ideas to provide infrastructure are neither in place or time-lined in advance of the proposed developments. There are currently no plans whatsoever to develop new healthcare with these massive scale extensions of population. At best there is only marginal attempt to set aside land for education, but there is no schedule of timed completion and no consideration for who would build a school on this land. In all probability, this would not be progressed and would then be turned into yet more housing for any already over stretched population.

## 2. Inconsistent with Leeds Development Plan Policies:

I. **LACK OF AFFORDABLE HOUSING:** The need for large scale affordable housing and single owner properties will not be fulfilled by developing on sites on greenbelt land in semi-rural areas, but on the renewal of brown field land in areas in need of urban regeneration and investment. For example the three sites listed above are in areas which command property values for new build currently starting at circa £325,000 (eg: Horsforth Vale); which is in no way part of a plan which prioritises the progression of affordable housing. The small percentage set aside for affordable housing within these premium area developments only scratches the surface of the problem and in no way alleviates the real issue in the way that true urban regeneration should.

II. **DENIAL OF HOUSING TARGET RE-ASSESSMENT NEED:** The current housing target which drives the need to develop on the greenbelt is flawed and needs to be changed. It is based on outdated, over inflated housing targets which require that over 66,000 new properties are still needed. This urgently needs to be brought in line to the latest 2014 figures (from the Office of National Statistics), which show a need of only 46,000 new homes.

III. **DELAYING OF HOUSING TARGET RE-ASSESSMENT NEED:** In order to prevent the unnecessary permanent destruction of greenbelt, the current plan to re-assess the housing target needs to be put in place before the site allocation plans are progressed, and not after them - as currently planned.

IV. **UNSUITABILITY FOR SINGLE OWNER OCCUPANCY:** Leeds' core strategy identifies a significant need for single owner occupancy housing (upwards of 40%), which will not be met by developing in the above sites. The developers will opt to construct multiple bedroom properties which sell for the highest profits, as evidenced in locally based sites, such as Horsforth Vale.

## 3. Negative Impact on Highway Safety and Traffic:

I. **COMPROMISING ON SAFETY:** The above three sites are located on a section of Ring Road and the A65 which is one of the most congested and dangerous in Leeds. Adding over a thousand extra houses which all need to utilise this same stretch of road will cause daily gridlock and increase serious accidents within this over burdened area.

II. **INABILITY TO COPE WITH TRAFFIC:** The adjoining section of Ring Road (A6120) leading out of the areas of the three sites named above is bottlenecked between three separate single lane bridges (one railway, one canal and one river). Therefore the ability of these sites to accommodate over 1,000 extra houses must be limited in line with the ability to deliver proper infrastructure to serve them.

## 4. Lack of Conservation of the Natural Environment:

I. **DESTRUCTION OF HABITATS:** The above sites are host to crested newts, different species of bats, owls, hawks, wild deer, badgers and a huge array of wildlife that will perish as a result of the proposed development. While there may be token provision allocated for selected species, the majority are not even noted or recognised in the inadequate environmental impact assessments which have been conducted to date.

II. **ISOLATION OF WILDLIFE:** The above sites provide a continuous chain of greenbelt along

the River Aire Valley, which allows the wildlife migratory and residential access across the region. The destruction of these greenbelt sites will lead to their isolation, hemmed in by the proposed housing and Ring Road, leading to their permanent demise from the area.

III. REMOVAL OF COMMUNITY ENGAGEMENT WITH COUNTRYSIDE: Site HG2-41 (4240) is used both as working agricultural land and also as Pick Your Own fruit fields. During the fruit picking season, the fields provide thousands people from the local community with a meaningful way to connect with the natural environment. Literally hundreds of families, many with small children arrive each week to pick their own strawberries and raspberries amongst the butterflies.

5. Negative Effect on the Landscape:

I. DESTRUCTION OF NATURAL VIEWS: The combined fields comprising site HG2-41 (4240) is an integral part of the landscape of Horsforth and Rawdon. The current vista from the A65 provides views of the natural landscape stretching through the Aire Valley right up towards the distant hills of Shipley Glen. If developed on, this connection local people have with their natural environment will be lost forever.

6. Lack of Co-operation with Neighbouring Councils

I. NO COHERENT REGIONAL CO-ORDINATION: The neighbouring satellite towns that accommodate a large percentage of the working populations of Leeds contain huge swathes of post industrial, derelict brown field sites that lay undeveloped. These ideally suited sites across Bradford, Halifax and Wakefield should first accommodate the excess housing capacity volumes, before the Greenbelt sites of Leeds are considered.

7. Unsuitability of Consultation Process

I. WEB SITE OBSTRUCTIVENESS: The council's consultation feedback website does not allow for the objections of greenbelt development across Leeds. The method is divisive in that it forces the user to focus only on sites on an individual field by field basis, making the commenting of objections to all proposed sites an impossible task.

II. LIMITING ACCESS TO INFORMATION: There is nowhere in the council's published documentation that provides a clear list of greenbelt sites which are nominated for development. They are hidden in isolation amongst the wide array of other sites, making them inaccessible to the public.

III. LACK OF PUBLIC AWARENESS: Less than 25 members of the public attended the councils' largest scale opening exhibition held in the Grand Hall of the Civic Centre. There have been no visible letters sent to households across Leeds, no TV campaign, no radio campaign, no social media, no newsletters via schools, nothing. As a result, the vast majority of the people of Leeds have not been given the opportunity to comment on issues that affect them.

On these and other grounds, we sincerely hope that you are able to act on our behalf and reject the progression of these greenbelt sites within the development proposals. Please keep me informed of opportunities to present my objections to the planning panel, the public examinations, the submission of the plans and potential outcome of the review.

Yours Sincerely,

Dr Dominic Welburn