

From: [REDACTED]
To: [Site Allocations Plan](#)
Subject: PDE01703_Objection to LCC's site allocation plan
Date: 13 November 2015 19:45:31

Dear Sir/Madam,

I wish to object to the Site Allocations Plan published by LCC.

The sites I would like to object to are:

HG2-12 Woodlands Drive, Rawdon (field at the end of Southlands Avenue)
HG3-2 Land to West of Knott Lane
HG3-3 Knott Lane East
HG3-4 Layton Lane
HG2-41 South of the A65 (known locally as the 'Strawberry Fields')

The following comments relate to all of the above sites. I have also included specific comments and objections under different site reference headings.

As per paragraph 182 of the National Planning Policy Framework (NPPF), the Site Allocation Plan published by Leeds Council is unsound. The reasons are as follows:

LCC has not consulted local residents, communities or parishes about any of these proposed sites. They may claim to have had public events in place for people to comment on their plans, but have made advertising intentionally obscure, so that normal people don't know what the meeting is about. The advertising is always last minute, and underhand. On purpose. Please see a photo (attached to this email) of the SAP public consultation at the Horsforth Mechanics Institute, Saturday 3rd October 2015. The sign was on the INSIDE of the building. No other external signs were evident. The Council have a legal duty to communicate with the local neighbourhood about what they are planning. LCC also had a public consultation about their plans in 2013, which no one was aware of. LCC have not taken sufficient steps to ensure that local communities were informed or consulted.

All sites have not been subjected to a comprehensive Greenbelt review.

All sites are not justified. Development of any of these sites blurs the lines between Leeds and Bradford. Ghyll Beck runs near, alongside or through all these sites, which is the boundary between Rawdon and Horsforth. Houses here will potentially cause villages to join, and ergo, cities to join. This is the ultimate in urban sprawl (NPPF, Section 9.80, page 19).

The A65 cannot cope with any more traffic. There is no way that it can be widened to any degree. More development running along the A65 will potentially be more dangerous and unsustainable. It just cannot be justified. Especially as this power-hungry council, intent on becoming the Northern Powerhouse, are planning an airport link road - again, over swathes of Greenbelt.

All local schools are already over-subscribed. Building a new school is just putting a sticking plaster over the problem.

Brownfield sites are available all over Leeds to develop first. Just because the developers say that developing brownfield is not 'viable', doesn't give them carte blanche to buy up lots of lovely Greenbelt to sell on at a massive profit. They should be MADE to develop brownfield first. Please campaign central government to provide an incentive to do this. Once Greenbelt has gone, it's gone FOREVER. LCC's Core Strategy states that brownfield sites should be used before Greenbelt, so this Site Allocation Plan contravenes their own Core Strategy.

The Plan is not effective. The Council Planners have admitted to members of local community groups that infrastructure will be examined AFTER the proposed building phases. They therefore have not provided enough evidence that there is sufficient, fit-for-purpose infrastructure in place to cope with 1000's of new builds.

The Plan is not consistent with national policy. In protecting Greenbelt (NPPF, 9.80, page 19), the five points to consider are:

to check the unrestricted sprawl of large built-up areas – **the sites DO add to urban sprawl**
to prevent neighbouring towns merging into one another – **the sites DO merge neighbouring towns**

to assist in safeguarding the countryside from encroachment – **the Plan DOESN'T safeguard encroachment**

to preserve the setting and special character of historic towns – **Rawdon has historic, special character which will be severely affected by these proposals**

- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land – **available brownfield is NOT being utilised first.**

The housing figures used by LCC, and on which they based their Core Strategy, are not up-to-date. The ONS population forecast figures used were from 2008, and the NPPF states that the requirement is to use the most up-to-date figures. These would be the 2011 figures, which would decrease the number of required housing to around 45,000. When questioned on this, they said that '...they can't keep changing the figures' and that '...if we changed them, then the developers wouldn't be happy'.

The Council have not evidenced any 'exceptional circumstances' (NPPF, 9.83, page 19), to justify developing any of these sites.

The Council should be using existing empty properties first (NPPF, 6.51, page 13).

All sites are classified as Class 3 agricultural land.

Heritage England has deemed the Site Allocation Plan as unsound.

There is no evidence that Leeds City Council has consulted with neighbouring authorities.

The Site Allocation Plan is not legally compliant with the Statutory of Community Involvement (SCI).

HG2-12 Woodlands Drive, Rawdon (field at the end of Southlands Avenue)

This site is a UK Biodiversity Action Plan (BAP) Priority Habitat. The NPPF states that “When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity...” (NPPF, Section 11, 118, page 27).

Currently, there is only one access point to this site (via Southlands Avenue). The only other feasible access would be via PAS land site reference HG3-2. As this site has been safeguarded until 2028, development of HG2-12 (which has been allocated for delivery before this Phase 3 site) will not be possible.

This site proposal is not legally compliant as it wasn't included in the Issues and Options consultation in June. There was also no consultation on this site prior to it being allocated for housing in the Site Allocation Plan.

There is only one access to the A65. Knott Lane is not suitable for further development. It already prohibits HGV traffic. Joining the already virtually gridlocked A65 from Knott Lane will become increasingly dangerous. Knott Lane is already used extensively by the local crematorium.

Leeds Country Way runs through this site.

This site actually abuts the Cragg Wood Conservation Area.

In conclusion for this site, I would like HG2-12 completely removed from LCC's Site Allocation Plan.

HG3-2 Land to West of Knott Lane

This site is a UK Biodiversity Action Plan (BAP) Priority Habitat. The NPPF states that “When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity...” (NPPF, Section 11, 118, page 27).

My relatives (who live very near Knott Lane) were not informed of the change in status from Greenbelt to PAS land. Neither were other local residents. We only found out about the Council plans from local community groups.

Leeds Country Way runs alongside this site.

In conclusion for this site, I would like HG3-2 to be returned to Greenbelt status.

HG3-3 Knott Lane East

This site is a UK Biodiversity Action Plan (BAP) Priority Habitat. The NPPF states that “When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity...” (NPPF, Section 11, 118, page 27).

My relatives (who live very near Knott Lane) were not informed of the change in status from

Greenbelt to PAS land. Neither were other local residents. We only found out about the Council plans from local community groups.

There is only one access to the A65. Knott Lane is not suitable for further development. It already prohibits HGV traffic. Joining the already virtually gridlocked A65 from Knott Lane will become increasingly dangerous. Knott Lane is already used extensively by the local crematorium.

Leeds Country Way runs alongside this site.

This site is within the Cragg Wood Conservation Area. It is currently used to keep chicken, geese, ducks and bees.

In conclusion for this site, I would HG3-3 to be returned to Greenbelt status.

I am a mother of two young boys, and the enjoyment they have walking amongst the woods and fields surrounding my sister-in-law's house is second to none. Please do not let greedy house builders, farmers and councillors take that away from my children, and the children of the future. You have a moral duty.

G. McKeown
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Yours faithfully,

G. McKeown

