

From: [REDACTED]
To: [Site Allocations Plan](#)
Subject: PDE01837_Leeds City Council Site Allocation Consultation - Objection
Date: 13 November 2015 12:22:02
Attachments: [image002.png](#)

To whom it may concern at Leeds City Council

Re. Objections to Leeds City Council Site Allocation Plans, sites HG2-41, HG2-12, HG3-3, HG3-2, HG3-4

I wish to raise the following objections to the Leeds City Council Site Allocation Plan.

Is it consistent with National Policy?

The National Planning Policy Framework (NPPF) **paragraph 79** states 'The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.'

Leeds city council's site allocation contradicts this and does in fact create urban sprawl. Site HG2-41 will contribute to the joining of Rodley, Horsforth and Rawdon.

Paragraph 80 states Green Belt serves to:

1. check the unrestricted sprawl of large built-up areas;
2. prevent neighbouring towns merging into one another;
3. assist in safeguarding the countryside from encroachment;
4. preserve the setting and special character of historic towns; and
5. assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Leeds City Council's decision to select sites **HG2-41, HG2-12, HG3-3, HG3-2, HG3-4** ignores several of the above purposes and again is inconsistent with national policy.

The decision to allocate green belt land as part of the site allocation plan completely contradicts item 5 from **paragraph 80**.

Paragraph 83 states:

'Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the local plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.'

Leeds City Council's site allocation plan and the need to use Green Belt sites is **not** an exceptional circumstance. Brownfield sites should be identified and used as a priority as point 5 from paragraph 80 stated above.

The Housing Minister, Brandon Lewis, in answer to a question proposed by Stuart Andrew PM stated 'Unmet housing needs should not exceed maintaining the greenbelt, and this is put forward in the National Planning Policy Framework'. Therefore, once again, Leeds City Council's site allocation plan contradicts the NPPF.

Have the plans been positively prepared?

Firstly, Leeds City Council has not informed the Leeds community adequately about this site allocation. I have been led to believe the Council held a public consultation about their plans in 2013. I did not know about this. I have lived in Yeadon and now Rawdon for over 22 years, and have had no correspondence concerning the proposed Site Allocation Plan.

Rawdon's site allocation plan is not based on a comprehensive Greenbelt review as required by the previous inspector when the Core Strategy was passed as sound. The selective greenbelt review undertaken by Leeds City Council as part of the Core Strategy and Site Allocations Plan is therefore unsound.

The current Leeds City Council target of 70,000 new houses by 2028 consisting of 66,000 planned sites and an extra 4,000 unplanned sites is based on out of date statistics and should therefore be re-

assessed and calculated.

Leeds City Council should be aware of the most recent statistics based on the 2011 census and how the Leeds population is only likely to grow by 64,000 people.

The UK government confirmed it would consider, building 1 million new homes by 2020, a success.

Based on the 2011 census and Leeds's population size, a fair share for Leeds would be 44,610 new houses over a 15 year period. A significantly smaller number than the 70,000 target set by Leeds City Council Site Allocation Plan.

Are the plans justified?

HG2-12, HG3-3 and HG3-4 are all classified as UK Biodiversity Action Plan (BAP) Priority Habitats and host a variety of wildlife, namely wild deer, bats and sparrow hawks. All sites contain protected mature trees. The decision to build on these sites would be irreversible.

The above sites are also classified as Grade 3 farmland and farmed regularly. Removal of this farmland and its transformation into building projects again is an irreversible action and could result in a loss of workforce.

The Rawdon section of the A65 is already full and over-capacity. The new changes to Horsforth roundabout (changing the lane allocations and installing traffic lights) has not improved traffic flow but has only served to increase the traffic congestion. Traffic tailbacks originating at Horsforth Roundabout now extend, into Rawdon, beyond Layton Lane and Carr Lane. This is a daily occurrence now, Monday – Friday, both during AM and PM rush hours. This wasn't the case before the changes.

This increase in A65 traffic congestion has already caused an increase in traffic flow through Rawdon village and High Street. Commuters are now using this route as an alternative to queueing in the A65 traffic. Rawdon High Street is a 20mph zone with a primary/junior school situated on it. Additional traffic using this alternative route increases the danger to the schoolchildren. Layton Lane with its newly surfaced road is now also being used more as a 'rat-run' to avoid queueing in the A65 congestion. The newly resurfaced road has increased the speed which vehicles now traverse this road, even though it has a speed limit of 20mph.

The introduction of additional housing in **HG2-41, HG3-2, HG3-3, HG2-12 and HG3-4** will only serve to increase the congestion misery commuters' face on a daily basis during rush hours and beyond.

The potential addition of a new school at **HG2-41** would add further congestion and gridlock around Horsforth roundabout and the Leeds outer ring road also around school start/finish times.

Will the plans be effective?

Sites **HG2-12, HG3-2 and HG3-3** would only have one point of access onto the A65. An allocation of 246 houses would make the Knott Lane/A65 junction an extremely busy and dangerous road junction to navigate at the busiest times of the day.

HG2-12 would only have one access road via Southlands Avenue, via Knott Lane. Knott Lane is barely suitable for the current housing, so to add hundreds more houses will further degrade the status of that road.

HG2-12 is contingent on development of safeguarded sites **HG3-2 and HG3-3**. However **HG2-12** is allocated for delivery considerably earlier than these potential phase 3 sites. With **HG2-12** incorrectly categorised as allocated, this cannot be delivered.

With Bradford City Council's decision to develop additional housing at Apperley Bridge and also at Simpson's Green, this provides even further potential to add to the traffic congestion around the A65 area, should those who live at these new developments need to travel via that direction.

Please inform me of any subsequent public meetings/hearings which may follow once these objections have been forwarded to the relevant inspectors/parties. I would like to be able to contribute further and listen to any subsequent proceedings.

Kind regards

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