

From:
To: [Site Allocations Plan](#)
Subject: PDE01900_Response to Leeds City Council Site Allocation Consultation
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12 November 2015

To whom it may concern at Leeds City Council

I am writing to express my objections to Leeds City Council's proposed Site Allocation Plan for major housing development in Rawdon and Horsforth for the following reasons.

Lack of consultation

I was unaware of any previous Council public consultations regarding these development plans which apparently were held in in 2013. I only became aware of these present consultations from information provided by the Rawdon Greenbelt Action Group and I feel that Leeds City Council has not met its duty in fully consulting with all sections of the communities in an open and accessible way.

I do not feel that the proposed developments are justified.

These developments are inconsistent with the governments National Planning Policy Framework (NPPF) and Leeds City Councils own Core Strategy.

The NPPF states that one of the Green belt purposes is to "assist in urban regeneration by encouraging the recycling of derelict and other urban land". Section 1.8 of the Leeds Core Strategy states a key priority as "maximising opportunities to recycle previous developed land whilst minimising greenfield and Green Belt releases" In reality Leeds Council is ignoring its own Core Strategy by planning development on Greenfield sites such as site HG2-41, identified previously as a 'special landscape' (Leeds UDP) and shown in the Core Strategy as 'Strategic Green Infrastructure' along with HG2-12, HG3-2, HG3-3 and HG3-4.

I am unable to find a **comprehensive** greenbelt review as required under the core strategy on the council website and as such believe one has not taken place. I feel the methodology used is flawed due to the inconsistency of decisions made. For example site HG2-12 shows greatest impact compared to nearby sites but has been allocated for development.

Section 11 of the (NPPF) states that “In preparing plans ...the aim should be to minimise pollution and other adverse effects on the local and natural environment. Plans should allocate land with the least environmental or amenity value...” It also states that the planning system should “protect and enhance valued landscapes”, “recognise the wider benefits of ecosystem services” and “minimising impacts on biodiversity”.

The Leeds Council Core Strategy does not meet any of these objectives.

Sites HG2-41, HG2-12, HG3-2, HG3-3 and HG3-4 will have an **adverse effect on the local and natural environment**. These areas of land host a variety of wildlife and are used regularly as community spaces for sport and leisure. Sightings of wild deer, small birds of prey, bats, owls etc are common. Wild flowers including blue bells are found in established woodlands. These are important wildlife corridors between the busy urbanised areas of Rawdon and Horsforth which have had a high educational value for local children for generations.

These spaces help support and maintain the community’s health and wellbeing and cannot be recreated by artificial planning developments. Once they are lost they are lost forever for us and the next generations. This is **not consistent** with the governments National Planning Policy Framework statement that **sustainable development** is about **change for the better**.

I do not believe that Leeds City Council has identified **exceptional circumstances** that justify these plans or shown why these sites are **more appropriate** when compared to other alternative sites within Leeds. These ‘protected’ sites should be removed from the Core Strategy completely and not be considered as ‘reserves’ as other more appropriate sites are available.

I do not believe that the proposed developments are effective

These are not sustainable developments or effective plans for the future.

The geography of this area does not lend itself easily to improvement in infrastructure due to a river, canal and train tracks running down through the valley. This leads to bottlenecks where traffic have to use bridges to cross when travelling to and from the major cities of Leeds and Bradford

There is a lack of evidence of Leeds Council providing plans and policies to show how the A65 will be able to sustain the greatly increased amount of traffic that will be generated from the proposed numbers of houses in the development plans.

It also does not take into account the potential increase of traffic from the following:

- <!--[if !supportLists]-->• <!--[endif]-->The reopening of Airedale International Air Conditioning Ltd on the A65
- <!--[if !supportLists]-->• <!--[endif]-->The impact of additional road usage to access the new rail stations at Apperley Bridge and Kirkstall Forge
- <!--[if !supportLists]-->• <!--[endif]-->The proposed Simpson Green development at Apperley Bridge

The last two show a **lack of co-operation** between Leeds City Council and Bradford Metropolitan District Council ignoring the NPPF recommendation that neighbouring authorities should work together. There is no evidence of a joint sustainable transport policy with regard the impact of housing developments near the boundaries of the two authorities.

The result of this lack of co-operation has already had a major impact on the amount of traffic using the A65, Micklefield Road and Apperley Lane following finished developments in the surrounding areas. Further development could be disastrous resulting in potential gridlock.

Some days gridlock is nearly a reality. On weekday mornings (7 – 9 am) rush hour traffic backs up from Greengates traffic lights, up as far as Micklefield Park and JCT Roundabout and sometimes across Rawdon Traffic lights and Green Lane. Traffic backs up from Horsforth roundabout, up past the crematorium and Layton Lane. Development of any of these proposed sites (HG2-12, HG2-41, HG3-2, and HG3-3 & HG3-4) would create sufficient traffic for gridlock to become a daily reality.

At present this results in cars cutting through Rawdon village and queueing into the centre of Horsforth increasing congestion and pollution. The re-design of Horsforth roundabout has not improved the flow of traffic and is not future proof to manage increased traffic from these designated development site. There appears to be no transport plan to address these concerns for any of the sites that will need access to the A65.

Increased housing development will result in gridlock throughout the area every weekday **increasing** not minimising pollution as stated as an objective in the NPPF.

In conclusion I do not feel these development plans are justified or sustainable in the long term. I would question the soundness of plans and if they are legally compliant given the high allocation of Greenfield and Green Belt. Sites and the lack of community consultation. This has not been a collective enterprise!

I believe the residual cumulative impact of the developments would be severe, blurring the boundaries between communities, damaging local and natural environments and does not fulfil the purpose of achieving sustainable development that is a “change for the better”.

I do not feel it has been positively prepared in line with the policies of the core strategy & NPPF and I believe the adverse impacts on the local communities will significantly and demonstrably outweigh the benefits when assessed against the policies of the NPPF as a whole.

Yours sincerely

Helen Martel