

**From:** [REDACTED]  
**To:** [Site Allocations Plan](#)  
**Subject:** PDE01946\_HG2-12 Objection to Housing Site Allocation Plan Proposals  
**Date:** 12 November 2015 19:02:13

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Dear Inspector

I wish to raise a formal objection to your proposals to develop housing in Rawdon, close to or on the green belt. Leeds is a city that is defined by its blend of urbanity and rurality. The villages in Leeds are punctuated by green spaces that keep them distinct, as opposed to the urban sprawl of Greater Manchester and Liverpool where communities blend into an indistinct, continuous suburban sprawl. I fear that your plans will ruin Leeds' unique character, and that they are unsound.

In terms of soundness, your plans are not sound on the basis of your four tests. They are not justified, not effective, not positively prepared and not legally compliant. The evidence for this is set out in the attached document.

Please do not mistake my inclusion of this pre-prepared material as unthinking acceptance of the arguments or a lack of interest. As a family, we use the spaces listed for walking, running, cycling and blackberrying, strawberry picking. We commute on roads that are packed and face ever longer delays at peak time. We have seen significant development in the local area already.

I urge you to consider seriously this objection.

Rob Webster on behalf of the Webster family  
7 Henley Close  
Rawdon

**QUICK SITE REFERENCE:**

**HG2-12** Woodlands Drive **HG2-41** Rawdon Crematorium - Horsforth Roundabout **HG3-2** Knott Lane West **HG3-3** Knott Lane East **HG3-4** Layton Lane

**Development NOT justified:**

**Special Landscape Area forever LOST**

by spoiling distinctive open valley views and rural character of Rawdon village and Leeds/Bradford green corridor. All sites are within LCC's own designated Special Landscape Area. HG2-12 and HG2-41 would have particular visual impact.

**Rawdon Cragg Wood conservation area LOST**

by marring its setting and views which are intrinsic to its historic character as enshrined in Cragg Wood Conservation Area Appraisal. HG3-3 is within the conservation area, and HG2-12 within the immediate setting of conservation area.

**No comprehensive greenbelt review, as required under Core Strategy.**

**Vital area of greenbelt forever LOST**

blurring the gap between Leeds and Bradford, encroaching into our open countryside. This is unplanned urban sprawl. Rawdon's village identity gone. *All sites in Greenbelt.*

**Strategic Green Infrastructure of Aire Valley forever LOST**

restricting enjoyment of area for walking, cycling, horse-riding and harming nature and ecology. *Leeds Country Way* runs through HG2-12 and alongside HG3-2 and HG3-3, a key regional recreational route. All sites part of LCC's own designated *Strategic Green Infrastructure Area*.

**A65 FULL and over-capacity**

Concentrating more developments along A65 is unsustainable, dangerous and would be disaster for area. HG2-41 with a school would cause gridlock at ring-road. Worsened by one-point access into HG2-12, HG3-2 and HG3-3 from unsuitable Knott Lane. Limited mitigation measures.

**Wildlife habitats LOST**

HG2-12, HG3-3 and HG3-4 are *UK Biodiversity Action Plan (BAP) Priority Habitats*, hosting wild deer, bats, fieldfare, lapwing, curlew, sparrowhawk, tawny owl. Ancient Ghyll Beck runs next to HG3-4 Layton Lane fields and through HG3-3 and HG2-41. All sites contain protected mature trees and woodland. HG3-3 has a native bluebell wood. HG3-2 is adjacent to *UK BAP Priority Habitat pond* with palmate newts, also found in HG2-12.

**Grade 3 farmland LOST**

All sites classified *Grade 3 agricultural land*. Rawdon's several farms are major employers in the village which has a rich farming heritage. HG2-12, HG3-2 and HG2-41 are regularly farmed. HG3-3 home to family's smallholding and a bee-keeper's apiary.

**Basic errors** in the Council's site sustainability and greenbelt assessments for all sites. *Many details to come on our website.*

**Major flaws** in methodology of assessments eg HG2-12 allocated even though sustainability appraisal scores it -7, the worst of all nearby sites. Greenbelt Assessment shows greatest impact compared with other sites, yet HG2-12 is allocated while nearby sites safeguarded. Why?

**Not enough school places** local schools heavily over-subscribed.

**Potential alternatives** have been overlooked:

**North East Bradford** Has the Council worked with Bradford Council to look at joint plan for bordering towns and villages?

**Brownfield sites** ARE available elsewhere across Leeds. LCC Core Strategy says itself that all these must be developed before greenbelt land.

**Council has not revised its housing target** in response to revised ONS projections which would mean city needs 45,000 and not current target of 70,000 - on which Council based its Core Strategy. A reduction in target of just 15,000 would remove need to take any land out of greenbelt.

**Development NOT effective:**

**Phasing of HG2-12 UNDELIVERABLE**

Highways access to HG2-12 is contingent on development of 'safeguarded' sites HG3-2 and HG3-3. But HG2-12 is allocated for delivery earlier than these phase 3 sites. It has been incorrectly categorised as 'allocated' and CANNOT be delivered.

**Highways access LIMITED**

HG2-12: Only one access point into site via Southlands Avenue as other roads private, inadequate for 130 houses. Knott Lane is barely suitable for additional development. Frequent Crematorium traffic also uses Knott Lane, affecting all three sites close by.

HG2-12, HG3-2 and HG3-3: Would collectively require realignment of Knott Lane but not serve them all adequately. Access issues onto congested A65 would remain and further deteriorate with increased traffic from significant housing developments.

**Significant surface water flooding** in HG2-12 may make site undeliverable.

**Development NOT legally compliant:**

**No consultation on site HG2-12 PRIOR** to it being allocated to housing in Site Allocations Plan.

**HG2-12 not included** in *Issues and Options consultation* in June.

**NOT COMPLIANT** with Statement of Community Involvement.

Did you know the Council held a public consultation about their plans in 2013, or that this current public consultation was happening? If not, mention this in your response.

**Development NOT positively prepared:**

**Site Allocations Plan for these Rawdon sites are not based on a comprehensive Greenbelt review as required by previous Inspector** when he passed Core Strategy as sound.

The **selective (and flawed)** greenbelt review undertaken by Leeds City Council means the Core Strategy and Site Allocations Plan are **UNSOUND**.

**Development NOT in accordance with the NPPF:**

**Especially chapters 9 Protecting Greenbelt, 11 Conserving Natural Environment and 12 Conserving Historic Environment.**

By not considering alternatives (see above), the Council has not proved that '*exceptional circumstances*' exist to outweigh the harm that development would cause to the greenbelt sites here. The Council say that '*growth*' is the exceptional circumstance, but government ministers disagree.

We advise you to include [Stuart.Andrew.MP@parliament.uk](mailto:Stuart.Andrew.MP@parliament.uk) when you email, and keep a copy for yourself safe. Once you've sent your response, please forward to [hello@rgag.org.uk](mailto:hello@rgag.org.uk) so we can keep a record of all objections.

**DEADLINE  
TO OBJECT  
16 NOVEMBER**

More details at [www.rgag.co.uk](http://www.rgag.co.uk) or email [hello@rgag.org.uk](mailto:hello@rgag.org.uk)

*It's Rawdon's greenbelt, come on we can do this - let's fight for it!*