

From: .
To: [Site Allocations Plan](#)
Subject: PDE02028_comments re Site Allocation Plans
Date: 12 November 2015 09:34:10

Hillgarth
Canada Crescent
Rawdon
Leeds
LS19 6LT
11 November 2015

LDF Publication Draft Consultation
Forward Planning and Implementation
The Leonardo Building
2 Rossington Street
Leeds
LS28HD

Dear Sir/ Madam

I am writing to you to comment on Leeds City Council's Site Allocation Plan. I believe that the Plan is unsound for a number of reasons.

Firstly I believe that the Plan contradicts both national policy, as outlined in the National Strategic Planning Policy and that it also contradicts Leeds City Council's own Core Strategy. National policy states that Greenbelt should only be used in "exceptional circumstances" and makes it clear that meeting housing targets does not constitute "exceptional circumstances". Leeds City Council's housing target of an additional 70,000 houses is based on out-dated forecasts from 2008. This data has been superseded by more recent data, including the 2011 census, and this data suggests that something in the region of 45,000 houses is a more accurate number. Additionally, Leeds City Council in its own UDP stated that Greenbelt should be safeguarded. It is clear from national policy that Greenbelt exists to safeguard the countryside from encroachment by development and to prevent urban sprawl. Greenbelt also exists to protect wildlife and its habitats.

Secondly the Plan gives no consideration to the fact that there has already been considerable development in the area. Aireborough has already had to accept a large amount of housing and yet the infrastructure has not improved. Indeed it would be accurate to say that the current infrastructure is woefully inadequate.

Thirdly I believe that the Plan is unsound because there is a requirement to consult and I believe that consultation has been inadequate for a number of reasons. There has been little or no consultation with local community groups and parish councils. At the official "roadshow consultation" it was clear that officers were inadequately prepared. I asked a number of questions to which they did not have answers and did not even know the location of some of the sites. I believe that there is a requirement to consult with neighbouring authorities and when I

asked officers about that there was no indication that they were aware of any. Additionally there has been no evidence of such in any of the material presented. Bradford, which is the neighbouring authority, has plans to build something in the region of almost 4,500 houses in adjacent areas and there is no evidence of any consultation between the two authorities. The effect that this might have on Aireborough does not bear thinking about. There has also be NO consultation with already designated Neighbourhood Planning bodies.

Fourthly I believe that the Plan is unsound because I believe that Greenbelt sites in this area are being used instead of brownfield sites elsewhere in the city. There are brownfield sites which were included in the SHLAA documentation and which have now been taken out of the Site Allocations Plan without any explanation having been given.

I also believe that the Plan is unsound simply because Leeds City Council has made it as difficult as possible to navigate the website in order to find out the information required. Additionally the response section of the site fails to work at times and responses are lost.

I also believe that the Plan is unsustainable. The loss of Greenbelt land means that the plan does not meet the sustainable development section of the NPPF which states that the planning system should contribute to and enhance the natural and local environment. The Plan does not protect and enhance valued landscapes. The problem is that once Greenbelt is lost it is lost forever and future generations will not be able to enjoy it.

I refer now to specific sites.

Site HG2-12 and Sites HG3 2/3/4. These sites are all in Rawdon and are all in the Greenbelt. They are all identified as part of the “ Strategic Green Infrastructure” within Leeds Core Strategy. Any development on these sites would also have an adverse affect on the Rawdon Cragg Wood Conservation area and indeed HG3-3 is within the Cragg Wood Conservation Area Appraisal. They are important habitats for wildlife and are important parts of the biodiversity infrastructure. The other important factor for consideration is that there has been no consultation at all on site HG2-12.

Site HG2-41

Although not in Rawdon, any development of this site on the scale envisaged would have serious consequences for the village. This site, known locally as “the Strawberry Picking Fields” is part of the Greenbelt. It was also identified within Leeds Core Strategy as a special landscape and is identified with this as Strategic Green Infrastructure. Importantly this site provides a very clear boundary between Rawdon and Horsforth and would undoubtedly lead to urban sprawl and the merging of the two communities. Again this is inconsistent both with the NPPF and Leeds Core Strategy. This site also forms part of the important Aire Valley wildlife corridor.

Site HG2-43

Again this site forms part of the Greenbelt. The development of this site is against the NPPF and also Leeds Core Strategy. It would also lead to urban sprawl and would add significantly to infrastructure problems that already face the area.

Site HG2-10

Again this site is part of the Greenbelt and any development would be against the NPPF and Leeds Core Strategy. It would also lead to the merging of Rawdon and Yeadon leading to urban sprawl. It would also adversely affect the Nether Yeadon Conservation area.

To sum up. I believe that the Plan is fundamentally unsound because it has not been prepared positively. The Plan is not sound because it is based upon outdated and therefore incorrect data. The Plan is not sound and is also unjustified because it does not agree with the NPPF and with Leeds Core Strategy. It is also unsustainable because it utilises Greenbelt land in preference to brownfield sites.

Paragraph 153 of the NPPF states that "each planning authority should produce a Local Plan for its area. This Plan can be reviewed in whole or in part to respond flexibly to changing circumstance". I believe that based upon the above that Leeds City Council must review its planning and its housing targets immediately and BEFORE any Greenbelt land is released.

Yours sincerely

John Davies