

From:
To: [Site Allocations Plan](#)
Cc: hello@rgag.org.uk; stuartandrew.MP@parliament.uk; saveourgreenbelt@rawdonparishcouncil.gov.uk
Subject: PDE02126_Public Consultation on Leeds SAP HG2-12 HG2-41 HG3-2 HG3-3 HG3-4
Date: 11 November 2015 10:41:35

Please acknowledge receipt of this email

Mr Neil Stirk
16 Lakeside Terrace
Rawdon
Leeds
LS19 6EE

To Whom It May Concern:

I am writing in regards to **LCC's Site Allocation Plan (SAP)** which I believe has many flaws that need to be addressed.

The main sites of concern are (but not solely):

HG2-12

HG2-41

HG3-2

HG3-3

HG3-4

These cannot be taken in isolation to other developments as they all have a knock on effect and I will also point this out in this email.

[Planning Department Failures](#)

I will show to follow the failings in many areas of LCC's own policy guides and Government guides. The loss of greenbelt, trees, landscape, ecological damage, conservation heritage damage, and the ignoring of infrastructure problems including local service facilities, educational facilities, highways and transport will show the **SAP** to be **unsound, not positively prepared, ineffective, unjustified, not consistent with National Policy Planning Framework (NPPF) with areas not legally compliant.**

The affected sites of concern are **HG12-12, HG2-41, HG3-2, HG3-3, HG3-4**

The allocation of housing to these sites is **unjustified** as other options have not been looked into in accordance with **National Planning Policy Framework (NPPF)**. The main areas of **NPPF** considered here are **Chapter 9 Protecting Greenbelt, Chapter 11 Conserving Natural Environment and Chapter 12 Conserving Historic Environment**. This shows that *exceptional circumstances* have NOT been met and with LCC choosing to ignore government ministers in stating that *growth* is an exceptional circumstance, when it is not, shows that LCC are making up their own rules, arrogantly ignoring government advice and the communities they serve. In exploring different avenues, have LCC even been in touch with Bradford City Council to check on their developments and framework to see how each of policies affect each other as the areas that are on the boundaries are suffering massively from development with no framework and infrastructure change.

Assuming that Bradford City Council has not been contacted, LCC are also going against their **Core Strategy** in not allocating to the Brownfield Sites that ARE available in Leeds, **Core Strategy** states that these Brownfield Sites MUST be developed before Greenbelt Land. 97% of development in Rawdon is on greenbelt when it need not be.

LCC need to stop being dictated to by the big developers who only want to develop in the afore mentioned sites as they can charge more in the area due to its beauty and desirability, LCC need to realise that once the beautiful and desirable area is over developed, it cannot be regained, it is LOST FOREVER.

The developments are known to be **unjustified** due to a failure to complete an up to date **Comprehensive Greenbelt Review** as required under **Core Strategy**. This was also required by a previous inspector under **Core Strategy** rules and it was stated that this review was required. The **selective and flawed Greenbelt Review is UNSOUND**, meaning that the **Core Strategy** and **SAP** need to be scrapped and started again from scratch. They are currently **UNSOUND**.

If a comprehensive review had been done it would show that the following will be *lost and destroyed forever*, ruining the open valley views, rural character and Leeds/Bradford character, why is this being ignored when it falls within LCC's **Special Landscape Area**? **HG2-12** and **HG2-41** would have particular visual impact.

HG3-3, HG2-12 Rawdon Cragg Wood Conservation LOST HG3-3 is within the conservation area and HG2-12 is within the immediate setting of the immediate conservation area. These woods are used for walking, dog walking, studying ecology, exercising etc.

All Allocations Vital areas of greenbelt LOST The allocations are encroaching on the countryside with the urban sprawl meaning Rawdon's individuality will go. It is my belief that under current government guidelines and indeed law, that the borders between Rawdon and Horsforth need to be respected and have a clear margin, current proposals mean that they will become one large town. I believe this may leave current allocations on the border to be open to legal challenge. All sites are in greenbelt, which proves that *no alternatives and Brownfield sites have not been looked at*.

HG2-12 HG3-2 HG3-3 Strategic green infrastructure of Aire Valley LOST This will harm nature, and ecology areas for walking, cycling, horse riding, dog walking etc. **Leeds Country Way** runs through HG2-12 and alongside HG3-2 and HG3-3, this is a vital regional recreational area with all sites being part of LCC's own designated **Strategic Green Infrastructure Area**.

HG2-12 HG3-2 HG3-3 Wildlife Habitats LOST HG2-12 HG3-2 HG3-3 are all **UK Biodiversity Action Plan (BAP) Priority Habitats**. These host wild deer, bats, fieldfare, lapwing, curlew, sparrowhawks, tawny owls to name but a few. The **Ancient Ghyll Beck** runs next to HG3-4 and through HG3-3 and HG2-41. All sites contain *PROTECTED* mature trees and woodland. HG3-3 has a native Bluebell Wood and HG3-2 is adjacent to a **UK BAP Priority Habitat Pond** containing Palmate Newts. Palmate Newts have also been found in HG2-12

HG2-12 HG2-41 HG3-2 HG3-3 Grade 3 Farmland LOST The loss of this land will mean Rawdon losing its Rich Farming Heritage and a loss of employment for many people in the area. HG2-12, HG2-41 and HG3-2 are all regularly farmed. HG3-3 is home to a small family small holding and a bee keeping apiary. Would this mean compulsory purchases are required when Brownfield sites are available? Would this come at a cost to LCC council tax payers or are the developers required to pay for this?

The ignoring of the afore mentioned 5 points shows *basic errors* in LCC's **Site Sustainability and Greenbelt Assessments** for all sites!!!

The developments are **unjustified** as there are **major flaws** in LCC's procedures in **ALL** of their assessments. **HG2-12** has been allocated as a site even though its **sustainability appraisal score** was **-7**, the worst of all nearby sites and the **Greenbelt Assessment** shows the greatest impact compared with other sites, yet it is still allocated!!! It is my belief that Major Developers concerns are the main consideration when allocating sites, not the strategy and impact issues that should lead to the decisions. I believe it would be prudent to look at **ALL** emails between LCC and these developers to show the leverage that the developers have had when allocating sites and to ensure the **SAP** decisions have been reached *ethically*. These email should be made public. If they aren't, I

will submit a **Freedom Of Information Request** for these, I know that it will be too late for these consultations but it may lead to a later legal challenge based on the content of these emails.

The developments are **not justified**, born out of LCC not revising its housing target in line with **ONS Projections** who stated that Leeds actually needs **45000 houses, not 70000**. **Core strategy** was based on **70000**, this means that the allocation of sites is **not effective** and needs to be reviewed. If LCC were not ruled by developers wants, they would review things and it would show that no greenbelt needed to be used. LCC are being bullied and influenced by the developers, it needs to stop!!!

There are also major developments issues with the plan for **HG2-12** which is **not effective** and **undeliverable**. This would have been known if LCC had held a consultation on this site **PRIOR** to allocating housing to it on LCC's SAP. It was **NOT** included **Issues and Options Consultations** in June and is **not legally compliant** with **Statement of Community Involvement**.

It is alleged that a public consultation was held in 2013, this was unknown to nearly everyone in the area, is there any public consultation happening at the moment regarding this before the SAP deadline?

It is so important for LCC to know that that **HG2-12** suffers *significant* surface water flooding which if the developers themselves know this, they may actually deem the site as **undeliverable**. It would be a **legal requirement** to let any potential buyers know about the surface water flooding as they may not be able to get insurance and if they do, it may be classed as invalid due to previous knowledge, that's if they get a mortgage. Any flooding and/or damage issues may then in turn lead to **legal action** against the developers and LCC due to previous knowledge of this issue. **Please put this on record as LCC being made aware of the potential problems of surface water flooding.**

HG2-12 is also **undeliverable** as it is assuming that safeguarded sites **HG3-2** and **HG3-3** are developed for *highways access*. **HG2-12** is allocated for delivery before these sites, yet it can **NOT** be delivered, a review of this needs to be done. I believe that it is a cynical ploy to ensure that HG3-2 and HG3-3 have to be developed, negating any legal challenges and/ or upheld objections on their future allocation. Only a review of this will make the site deliverable in the future if and when LCC choose to ignore all the evidence showing that HG2-12 should not be built upon.

Please respect the boundary between Rawdon and Horsforth, they are different places!!!

As a disabled person, these areas are important for my wellbeing, health and my exercise regime, if these are developed and the current road system (see later in email) gets any worse, I will not be able to go out at all, thank you LCC!!!

Again, please make PUBLIC the emails between LCC and developers.

Highways

HG2-12, HG2-41, HG3-2, HG3-3, HG3-4

HG2-12 as discussed is dependant on **HG3-2** and **HG3-3** and they is only one access point via Southlands Avenue as other roads are private. Knott lane is **not suitable** for development as the frequent traffic from the crematorium is already bad enough causing congestion down there but with the extra houses it will be even worse. These cars cannot get on to the A65 which is already heavily congested, often at stand still, how LCC think that this area can take more traffic is beyond belief. **HG2-12, HG3-2** and **HG3-4** if developed would require a re-alignment of Knott Lane (who would pay for this?), this re-alignment would not stop the afore mentioned congestion and access problems from occurring.

Heavily placing more developments on the **A65** is not sustainable, very dangerous for traffic and pedestrians and would be disastrous for the area, businesses, commuters, pedestrians etc. **HG2-41** would cause further gridlock on the **A65** with the school being built, the new traffic lights at Horsforth Roundabout have already added up to an hour on to peoples journeys, now they will have to deal with school traffic, those cars from Clariant site that is already under development plus all the new proposed developments in the area. It **WILL NOT** work!!! This is coupled with the afore mentioned Knott Lane development bringing extra traffic on to an already **FULL** and **CONGESTED A65** will be a disaster!!!

It now takes over an hour for people travelling the approx. 7 miles to Leeds from Rawdon and the Rodley/ Calverley areas after the development of Rodley and Horsforth Roundabouts. This will only be made worse when the Clariant development is completed and the prospect of travelling into Leeds if the new proposed sites go ahead in these areas is scary. It will only lead to people not going to Leeds at all, ending up stuck in the local vicinity having to shop online due to the parking issues in the area, affecting local and city centre businesses, this surely makes it **unsound** and has not been considered under **Core Strategy**.

I am guessing that LCC is **wrongly assuming** that people will use public transport. The system through the area is **not sustainable**, buses, taxis and private hire are all victims of the congestion and suffer the time limitations of all

other road commuters and the train systems is not capable of transporting all the commuters that are trying to use it, meaning that they are returning to the road system because even in its dire state, it is still better than the train system. For example, trains from Horsforth into Leeds have only two carriages in rush hour for such a large area meaning overcrowding resulting in people having to wait for the next train, there is only one ticket machine, people cannot get tickets in time for the journey and are then also forced to wait for the next train making them late for work, appts etc. Clariant dwellers are already being shuttle bussed to the station making the problem worse, and when it is completed and if the new development go ahead, travelling by rail will be a debacle. Yes there is the option of cycling, LCC need to live in the real world and realise the numbers for this are never going to be massive, people rely on their cars for work and/ or are just used to the comfort of the car. It is also very dangerous, having previously travelled from Rawdon to Leeds City Centre, I have seen numerous near misses and several cyclists laid on the road being treated by ambulance staff, this is at 6:30 in the morning, God help them in rush hour.

It will also be very dangerous in cases of **emergency** as emergency services will not be able to reach many areas in the region within reasonable time to prevent emergencies turning into major issues leading to possible fatalities, this not only makes the SAP **unsound** but also **negligent**. Look at the example of the recent Airedale Air Conditioning fire, if a major incident like this happened again now, it would be a great possibility that they could not reach the area to prevent casualties, if the new developments go ahead you are looking at many injuries or indeed fatalities, again making it **unsound** and **negligent**.

The strategy on looking into the traffic flow from these sites and other developments in the area is **flawed**. The data collected on traffic flow should be deemed **inadmissible**, it is known that a lot of the data collected in the area was collected during school holidays. Any data was also collected before the new traffic lights at Horsforth Roundabout and Rodley Roundabout plus the knock on effect of the congestion in the Apperley Bridge area. As mentioned all these problems have added an hour a day on to many peoples journeys due to the A65 being full and gridlocked with gridlock from Horsforth Roundabout to Priesthorpe School as well. The **Highways Agency** need to do an **independent review** of their own, not one conducted by the developers using little black strips across the road, these do not show the full picture.

As a disabled person, the times added to the journeys means I can only go out at certain times of the day due to my condition, this has affected other disabled people in the area and also the elderly who can now only travel at certain times of day due to congestion. I can also travel certain routes due to the excessive speed humps in the area, yes they are very painful to disabled people, meaning heavily congested routes it is. We are becoming trapped in our own homes/ immediate areas already, yet LCC want to add more traffic to the already full and congested A65 and other roads in the immediate vicinity.

Parking in Rawdon is already a nightmare, nigh on impossible, it is naïve to think that people moving into **HG12-12, HG2-41, HG3-2, HG3-3, HG3-4** will not

use these areas and make it worse. There is nowhere to park for those on the school run and again it is naïve to think that children from these new developments will not attend these schools and increase the problem. Parents have to park anywhere they can, often illegally as there is no choice, blocking peoples vision, road users and pedestrians alike, an accident will happen and I hope LCC can live with ruining a families life. You may think I am exaggerating but I have seen so many near misses and been involved in a few, through nobodies fault, that you can't help worrying about the children.

Current congestion means people are already using any means possible, as mentioned, people are having to use private car parks causing problems for businesses, medical institutions etc. I know of at least 2 cancer patients, who unfortunately do not want to give their names, that missed doctors appointments to assess their care as other commuters/school traffic had filled the car park and with parking as it is, the only place they could get was over quarter of a mile away and ended up missing the appointment as they could not walk that distance in time to get to their appointment. More and more instances of the locals being affected by the traffic will happen and the afore mentioned developments will add more chaos to the area and the lives of the people that LCC are supposed to look after.

LCC seem to be **disregarding** the fact that the people living in these new developments **WILL** travel to these already affected areas and have not considered the infrastructure problems and the lives of the people living in those areas.

I would also like to know if LCC have considered the other developments in the area when taking figures for the new sites or have they conveniently used it as stand alone data?

I would also like to know how many cars they are accounting for at each house on these developments? A survey shows that the average household in Britain has two cars (47%).

LCC's blatant disregard for the current gridlock in the area is only made worse due to LCC ignoring **government guidelines** and **ONS** recommendations and wanting to build 70000 houses instead of the 45000 that would still cause more congestion but not as bad as it is going to be. I believe allowing the over development in the area specifically **HG2-12, HG2-41, HG3-2, HG3-3, HG3-4** on top of the Clariant site is **negligent** as they are ignoring the danger for traffic and pedestrians, the fact that it is economically damaging, environmentally damaging (extra CO2 emissions greenhouse gases which have reached an all time high recently, only to be increased by standing traffic) and a failure in public office to consider the effect on peoples lives that LCC are supposing to represent.

Education

HG2-12, HG2-41, HG3-2, HG3-3, HG3-4

The local schools cannot cope, they have been heavily oversubscribed for some time, and the addition of so many houses on the above sites is only going to make it worse.

It is again naïve to think that the addition of a school on **HG2-41** will solve all these problems. Again it seems as though LCC has developed its strategy on these sites as stand alone developments. There are many more developments in the area including Clariant that means children from these sites **WILL** have to travel and attend other schools in the area. It is also, as previously mentioned, in the middle of the busiest area in Leeds around Horsforth Roundabout and will lead to more congestion at the busiest times of the day.

With more children in the area attending current schools, the education of children in the area will suffer due to overcrowding, some of these schools will not be able to take more children due to Health and Safety concerns meaning children would again have to travel adding to the afore mentioned traffic congestion and then we have to consider again where the parents are going to drop off these children. I have explained the parking situation and how dangerous it is, there **WILL** be a fatality. LCC, think of the children!!!

Medical

HG2-12, HG2-41, HG3-2, HG3-3, HG3-4

The current medical system in the area cannot cope either, they are already at stretching point and with these new developments it will reach breaking point. At present you often have to wait 2 weeks to see the doctor you want and even longer for the dentist (and yes that is with doctors working 7 days a week). I believe the doctors that are at breaking point are forced to take on extra NHS patients under the NHS contract and cannot limit them even if they can't accommodate them which will only worsen the current situation. This has to be considered again with other developments in the area.

Where are these people going to go that can't get to see the doctor, yes, Accident and Emergency putting an extra burden on the NHS. It's sad to say but it is well known that the 111 number doesn't work and most people calling this are advised to go and seek medical attention immediately.

To get a dentist in this area it is proving impossible for most people, it will be the same for any new people moving into the area, the only route possible for these people is private healthcare, this cannot be seen as acceptable for any new

people moving to the area.

Businesses

HG2-12, HG2-41, HG3-2, HG3-3, HG3-4

Local businesses are already suffering massively due to traffic congestion and lack of parking in the area. It has been happening in New Rawdon for years due to traffic congestion at Rawdon lights with most new businesses shutting after 6 months as they can only rely on customers travelling on foot. This has now seen spread with many business owners in surrounding areas complaining of lack of trade. People stuck in traffic for ages do not, when they actual pass a shop of interest, want to get out and go shopping and on most occasions, and even if they wanted to they couldn't, due to parking problems. This is now affecting well established businesses as well as start up businesses.

There is also a problem with people reaching appointments at businesses on time, this has caused massive problems, especially when job related and has also resulted in people getting sanctioned and losing their benefits.

This shows that these developments will not boost business as wrongly claimed, I am sorry, I do not know what trade these decision makers at LCC have worked in to think it will boost business, it won't, it will just hit the public and businesses financially, which can lead to other problems. LCC needs to start thinking about who will be affected by this over development.

Rawdon Crematorium

HG2-41 HG3-3

Whilst HG2-12 and HG3-2 affects the traffic congestion issue on Knott Lane/A65, **HG2-41 and HG3-3** developments are unthinkable. Not only do they fail on all previously mentioned areas, LCC have used their flawed plan and relationship with developers to allocate sites that take away part of the sacred grounds of Rawdon Crematorium. I cannot imagine who has made this decision but it is disgusting, people have had their ashes spread through these grounds, have bushes, trees, benches and other items around the grounds dedicated to their loved ones and yet the heartless LCC want to take this away from the community it serves. There is not a person in Horsforth, Rawdon, Yeadon and surrounding areas who does not have or knows of loved ones cremated and remembered in the crematorium. Would LCC let building happen on a grave yard, no, this is just the same!!!

On a personal note, I have many friends with memorials there of some variety. I also have my mum there, taken from me cruelly when I was younger at the mere age of 47, I have 2 grandads, 2 grandmas and an aunty there to name but a few. If the encroachment into the sacred grounds by these developments is not amended or stopped wholly as it should be, I will seek legal advice to block this. Not just for me but for the thousands of deceased people that have been remembered there over the years. I know I am not the only one that will fight this in any way they can if these developments are allowed to encroach on the sacred after the SAP inspection is completed. Please write to me personally to inform me of your reasons to allow these developments to encroach on to the sacred grounds, if this is the decision you take on these sites.

Conclusion

HG12-12, HG2-41, HG3-2, HG3-3, HG3-4

All the afore mentioned shows that the developments are **not justified, not effective, not legally compliant, not positively prepared and not in accordance with NPPF.**

The **flawed** and **basic errors** that have occurred are unbelievable in a project of this importance, LCC have gone against its own **Core Strategy, Government Policy**, ignored **ONS** statistics and failed to complete necessary **Greenbelt Reviews**.

All of this should mean that the project be torn up and started again and if this does not convince you to implement this, the fact that over development of 25000 houses in Leeds, the fact that LCC are choosing to build on **Greenbelt instead of Brownfield** sites and without looking at **alternatives**, shows they are acting outside guidelines and should be forced to restart the project.

It is clear to all that live in this desirable area that they are being led by the developers and the facts in this email show this. The developers will get more here and therefore so will LCC, this should not be the leading factor though, compliance with policy and guidelines should be.

I again urge you to look at and publish emails traffic between LCC and the developers.

Finally it needs to be considered that if you allow these development to go ahead, communities will be ruined, greenbelt lost, countryside ruined, wildlife

habitats gone and in general hard and worrying times will be ahead for a lot of those in the vicinity of these developments. Once development has started, we will not get back any of the afore mentioned, once it has gone it has gone for good and a once lovely rural area destroyed for unsavoury reasons.

I do not need to repeat the communities and my opinion and course of action surrounding the Crematorium.

I would be willing to take part in the forthcoming public examination and I would also like to be notified of the submission of plans for public examination and the adoption of plans.

If you need to contact me to discuss any matters, please do so, my details are as follows:

Neil Michael Stirk

16 Lakeside Terrace

Rawdon

Leeds

LS19 6EE

Yours truly,

Neil Stirk