

**From:**  
**To:** [Site Allocations Plan](#)  
**Cc:**  
**Subject:** PDE02155\_Site Reference HG3-4  
**Date:** 10 November 2015 20:18:13

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Dear Sir,

### **Site Reference HG3-4**

We write with reference to the proposed site allocations for development in Leeds with a strong objection to the proposals and in particular, site HG3-4.

There are several issues in allocating this site that should be taken into consideration and we are surprised given the strength of these points that the proposal has got to public consultation stage.

Any proposed development on Site HG3-4 clearly contradicts the content of the National Planning Policy Framework (NPPF) and in particular the need to protect Green Belt land. The NPPF 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 permanence". Clearly any development taking place on Site HG3-4 would be inconsistent with this statement.

Within the NPPF, Green Belt land is outlined as serving five purposes. Allocation of site HG3-4 would contribute towards not preventing neighbouring towns merging into one another (Rawdon / Horsforth) nor would it check the unrestricted sprawl of large built-up areas therefore again the proposed allocation can be seen to be inconsistent with national policy.

There is a further reference that is being ignored by Leeds City Council and that is the existence of Green Belt serving further purpose by assisting urban regeneration through the encouragement of the recycling of derelict and other urban land and whilst disregarding this is again inconsistent with the NPPF it also identifies other areas where housing development should be prioritised and the current proposals do not consider the extensive use of such land. Brownfield sites are available elsewhere across Leeds, these **MUST** be developed before Green Belt land.

The Housing Minister has also recently stated that "unmet housing needs should not exceed maintaining the Green Belt and this is put forward in the NPPF".

In addition to contravening the NPPF, this proposed site allocation is also inconsistent with Leeds Core Strategy, Section 1.8 requires the core strategy to respect local character and distinctiveness. Allowing development on Site HG3-4 would therefore not comply with the content of Leeds' own Core Strategy.

Leeds City Council's new housing targets have been set based on outdated statistics. There are 66,000 planned sites but a projected population growth of 64,000 over the same period based on the 2011 census means the planned numbers cannot be truly representative of Leeds' housing needs. In conjunction with changing circumstances (population size), Leeds City Council

has a duty of care to review its Local Plan as the use of obsolete housing target figures is now inconsistent with both the NPPF and Leeds Core Strategy.

Development of Site HG3-4 would also result in lost wildlife habitat, the site being a UK Biodiversity Action Plan (BAP) Priority Habitat hosting wild deer and bats amongst other species of protected habitat. Ghyll Beck itself runs adjacent Site HG3-4 and through Sites HG3-3 and HG2-41 with all three sites containing mature trees and woodland. This alone deems development to be unjustified.

In summary, we feel the Council have not demonstrated the 'exceptional circumstances' required to proceed with these developments. They are not aligned with the NPPF or Leeds Core Strategy and development should be refused on this basis.

Yours faithfully,

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