

From: [CDV Aire Valley Leeds AAP](#)
To: [Site Allocations Plan](#)
Subject: PDE02219_FW: site allocations comments
Date: 06 November 2015 15:13:28

From: Colin Smith
Sent: 27 October 2015 09:38
To: CDV Aire Valley Leeds AAP
Subject: site allocations comments

Dear Sir/Madam,

I wish to comment on the Leeds City Council Site Allocation Plan.

Firstly I wish to make some general comments which relate to the overall plan and can be applied to all the sites in Airedale, referred to subsequently.

- The overall plan for approximately 70000 homes in the Leeds is based on out of date information and depends on forecasts of economic growth from data from 2008. The current data suggests that approximately 45000 would be a more accurate number. Economic forecasts serve to make astrology look scientific.
- The philosophy of building more and more housing on the outskirts of cities is fundamentally unsustainable in the long term, in that it leads to more and more commuting and therefore, demand on transport infrastructure. It also has impact on energy use and pollution, issues which are at the forefront of modern environmental considerations.
- Government policy states that Green Belt should only be used in "exceptional circumstances" and makes clear that allocation for housing does not constitute exceptional circumstances. Leeds City Council in their UDP stated that greenbelt should be safeguarded. Greenbelt exists for a number of reasons including safeguarding the countryside from encroachment so that it remains accessible for recreation and enjoyment, preventing urban sprawl and preventing conurbations from fusing. It is there to protect wildlife and wildlife habitats. It is also intended to preserve the special character of historic towns and village, of which there are several in this area. **This plan conflicts with national policy as well as with Leeds own policy**
- There is minimal attention given to infrastructure. Roads throughout much of the city are very busy at all times and at rush hours are heavily congested. There seems to be no plan, coherent or otherwise to address this issue. There has been some improvement in rail transport but too little and too late, and there would appear to be no plans to address the chronic overcrowding that presently makes commuters' lives miserable. Infrastructure also includes amenities such as schools, leisure centres, shops and medical facilities and again there seems to be no indication that these matters have been considered, let alone addressed.
- There would appear to be no consideration to the fact that there has already been considerable development in the Airedale area and that this is ongoing, with the effects on infrastructure not yet apparent. The neighbouring authority, Bradford has also plans for substantial developments in the nearby towns and villages to the extent of 4300 homes, some of which are now under construction and whose effects have yet to be gauged.
- There still exists within the city considerable scope for building on brownfield sites yet a choice seems to have been made to develop sites on Green Belt first.
- One of the reasons that Leeds is regarded as a "good" city to live in and as a result

attracts talented and skilled workers as well as prestigious enterprises is that the city has a clear cut boundary with the surrounding countryside and access to that countryside for recreation is easy. This plan is in danger of killing that goose.

- Finally, once Green Belt is built on and developed, it is lost forever.

Before continuing to consider the individual sites in the plan, the following points are clear.

- 1 The plan has not been positively prepared and is poorly thought out in terms of its consequences on the quality of life for both current and potential new residents in Airedale.
- 2 The plans are not justified because they are based on out of date and incorrect figures for the future demand for housing in Leeds.
- 3 Because the plan takes no account of the current issues with infrastructure or the effects of the proposed developments demands it cannot be considered as effective.
- 4 It is not consistent with National Policy in respect of use of Green Belt land.

Referring to the specific sites:

HG2-41

This large site usually called "The Strawberry Picking Fields" is Green Belt and was previously identified by Leeds as a Special Landscape. It was referred to in the Leeds Core Strategy as "Strategic Green Infrastructure". It forms a substantial block of rural land to the south of and directly abutting the A65, giving the impression to any traveller that they have left the city at the Ring Road and have entered the countryside. This area lies adjacent to the Rawdon Cragg Wood Conservation area whose setting would be irreparably marred by this development.

It forms a clear boundary between the urban aspect of Horsforth New Road Side and the beginnings of Rawdon, i.e. is preventing the merging of adjacent urban areas. Building on this site would serve to merge Horsforth and Rawdon, and this is inconsistent with the NPPF and Leeds Core Strategy.

It also forms part of the Aire Valley wildlife corridor with Red Kites living and breeding in the nearby woodland, a species accorded the highest degree of legal protection in this country. Viewed from the Leeds-Liverpool canal, a very important leisure resource in this area, this large area of fields and woodland emphasises the rural nature of the canal to the west of Rodley. It is designated a "Special Landscape Area" by Leeds City Council.

The construction of approaching 800 homes on this site with an anticipated double that number of cars would cause even greater congestion on the already congested roads such as the A65 and the Leeds Ring Road which are yet to feel the effects of the ongoing developments at the former Sandoz site, HG1-96/7.

This site is not justified, it does not agree with the NPPF and does not agree with the policies in the Leeds Core Strategy. It has been neither positively prepared nor is it legally compliant. It fails on all counts: positive preparation, justification, effectiveness and consistency with national policy.

HG2-43

The principal issues with this greenfield site are the retention of Greenbelt, the further sprawl of Horsforth and the likely additional traffic generated.

It is at the A65 roundabout that the Ring Road descends to the Aire Valley and currently has a rural aspect which would be totally lost if the development of these sites along with HG2-41 were allowed. It would blur the cut off between urban and rural that this section of Ring Road creates and pave the way for further unwelcome development in the future. Part of this area is currently listed as a nature reserve and is adjacent to the extensive Rodley Nature Reserve which

would also be adversely affected by this development. Safeguarding wildlife and habitats is part of the UK Biodiversity Action Plan.

As previously stated, this area is busy at all times and heavily congested in the extended Leeds rush hour with the current road system unable to cope with rush hour traffic levels. The adjacent Horsforth roundabout is a particular bottleneck, even after recent modifications.

Although some housing has already been given consent on what could be regarded as a brownfield part of the site, further development should be prevented on the greenfield part.

This site fails on the counts of positive preparation, justification, and effectiveness.

HG2-12 and the safeguarded sites HG3-2/3/4

These sites are all in the Greenbelt and identified as "Strategic Green Infrastructure" within Leeds Core Strategy. They are adjacent to the Rawdon Cragg Wood Conservation area whose setting would also be marred by this development and HG3-3 is within the Cragg Wood Conservation Area Appraisal. A number of footpaths and other recreational routes cross these areas which are also generally important for wildlife. The HG2-12 and HG3-3/4 sites are UK Biodiversity Action Plan Priority habitats while HG3-2 is adjacent to UKBAP Priority Habitat pond with newts.

There has been no consultation on site HG2-12.

These sites are not justified, they do not agree with the NPPF and do not agree with the policies in the Leeds Core Strategy. They fail on all counts: positive preparation, justification, effectiveness and consistency with national policy.

HG2-10

This is best described as an infill site which would link Rawdon to the Yeadon-Guiseley conurbation and is precisely the sort of development that Greenbelt is intended to prevent although this site is not designated as such.

I personally am not very familiar with this site except as an area of green which separates the above urban areas, but its disappearance would lead to a section of continuous urban sprawl lining the A65 from Rawdon to Menston.

It is not justified to build on this site so long as there is available brownfield land in the city.

HG2-9

I find it incredible that anyone would want to build houses on this site let alone live there. It is next to the end of the runway at Leeds Bradford Airport and will get the full benefit of take off noise from aircraft.

However it is also adjacent to Yeadon Tarn and would have the effect of further surrounding this recreational area with housing which would degrade its attractiveness. The tarn is used by a variety of wildfowl, especially in winter (who seem not to be affected by the disturbance from the aircraft) but might well suffer if more development impinges on the area.

It is not justified to build on this site so long as there is available brownfield land in the city.

Conclusion

In the above I have attempted to comment on all the major sites within in the neighbourhood in which I live. I believe that the plans for development and housing in this area are deeply flawed and unsustainable, and in some cases not legally compliant. They are certainly not compliant with the clear statement that Greenbelt should only be used in exceptional circumstances which do not include housing. Leeds appears to have ignored the substantial number of brownfield sites within the city in favour of building on Greenbelt.

Clearly, building on Greenbelt is easier and more profitable for developers than building on brownfield sites, but the developers are the only ones to profit. Local residents have their quality of life degraded through loss of the amenity of the countryside as well as facing more noise, pollution, congestion and demand for necessities such as schools, doctors and similar, for which there is no provision in the plans. It is almost as though there is a level of political spite at work here because in this area there is little support for the ruling party on Leeds Council and the area is not represented by Labour MPs. It is as though a line has been taken that "if you won't support us we will do our utmost to degrade your quality of life"

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