

From: [Rachel Mitten](#)
To: [Site Allocations Plan](#)
Subject: PDE03008_Comments on proposed development of sites HG2-12, HG2-41, HG3-2 and HG3-3
Date: 16 November 2015 13:46:35

Comments on proposed development of sites HG2-12 (Woodlands Drive), HG2-41 (Rawdon Crematorium – Horsforth Roundabout), HG3-2 (Knott Lane West) and HG3-3 (Knott Lane East)

I wish to set out my complaints against the proposed developments noted above, on the basis that the development is NOT properly prepared, NOT effective, NOT legally compliant, NOT justified and NOT in accordance with the NPPF.

My detailed objections are set out below :-

1) Development NOT properly prepared:

- Site Allocations Plan for the Rawdon sites are not based on a comprehensive Greenbelt review as required by the previous Inspector.
- The selective and flawed greenbelt review undertaken by LCC means the Core Strategy and Site Allocations Plan are totally unsound.

2) Development NOT effective:

- Highways access is limited – in particular access to HG2-12 via only one access point via Southlands Avenue is inadequate. Knott Lane is unsuitable for additional development and already struggles to cope with the burden of significant traffic using the crematorium with vehicles parked on the exit route narrowing the road to one lane at peak periods.
- Significant surface water flooding in HG2-12 may make the site undeliverable.

3) Development NOT legally compliant:

- There was no consultation on site HG2-12 prior to it being allocated to housing in the SITE Allocations Plan.
- HG2-12 not included in Issues and Options consultation in June

4) NOT justified:

- The council has not revised its housing target in response to revised ONS projections which would mean the city needs 45,000 and not the current target of 70,000 on which the Council based its Core Strategy – a reduction in target of just 15,000 would remove the need to take any land out of greenbelt and protect this for the enjoyment of future generations.
- Special landscape area would be lost forever by spoiling distinctive open valley views and Leeds/Bradford green corridor. Both sites are within LCC's own designated Special Landscape Area.
- Vital area of greenbelt lost forever, blurring the gap between Leeds and Bradford and encroaching into open countryside. This represents unplanned urban sprawl and Rawdon's village identity would disappear. Rawdon Cragg Wood conservation area would also be lost.
- Wildlife habitats lost – the area supports a wide variety of birds and deer as well as protected mature trees and woodland and a Habitat pond adjacent to HG3-2.

- Grade 3 farmland would be lost – Rawdon's several farms are major employers in the village.
- Strategic Green Infrastructure of the Aire Valley would be lost, restricting the enjoyment of the area for walking, cycling, horse riding and harming nature and ecology. The Leeds Country Way runs through HG2-12 and alongside HG3-2 and HG3-3.
- No comprehensive greenbelt review has been undertaken, as required by the Core Strategy.
- Local infrastructure simply can't cope with the proposed development – the A65 is already full and over-capacity – access into HG2-12, HG3-2 and HG3-3 from Knott Lane is totally unsuitable and limited mitigation measures identified. Local schools are heavily over-subscribed.
- There are major flaws in the methodology of assessments – in particular HG2-12 has a large negative score but is still selected for potential development.
- It would appear that potential alternatives been overlooked – in particular Brownfield sites are available elsewhere across Leeds – why aren't these being developed before greenbelt is destroyed forever?

5) Development NOT in accordance with the NPPF:

- By not considering the more environmentally friendly but less lucrative alternatives the Council has not proved that exceptional circumstances exist to destroy this part of the greenbelt . 'Growth' appears to be the unique exceptional circumstance but government ministers dispute this, the growth assumptions which form the basis of this destruction of green belt are out-of-date as noted above.

Conclusion:

I hope my views, analysis and expression of real concerns over these proposals along with those of many others, will be considered when further discussions take place as part of the ongoing planning process. I do not believe that these proposals have any merit whatsoever.

Yours faithfully

Rachel Mitten
Sent from my iPad