

From: [Meryl Frazer](#)
To: [Site Allocations Plan](#)
Subject: PDE03053_RE: Unique Site References HG2-12, HG2-41, and HG3 - 2,3,4
Date: 16 November 2015 13:20:45

I wish to complain in the strongest possible manner in reference to ALL of the above sites, and submit

my reasons as follows:

Development NOT justified

Special Landscape Area forever LOST

by spoiling distinctive open valley views and rural character of Rawdon village and Leeds/Bradford green corridor. All sites are within LCC's own designated Special Landscape Area and all sites would be affected by a visual impact.

Rawdon Cragg Wood conservation area LOST

by marring its setting and views which are intrinsic to its historic character as enshrined in Cragg Wood Conservation Area Appraisal.

No comprehensive greenbelt review, as required under Core Strategy.

Vital area of greenbelt forever LOST

blurring the gap between Leeds and Bradford, encroaching into our open countryside. This is unplanned urban sprawl. Rawdon's village identity gone. All sites proposed are in Greenbelt designated land.

Strategic Green Infrastructure of Aire Valley forever LOST

restricting enjoyment of area for walking, cycling, horse-riding and harming nature and ecology. Leeds Country Way runs through a number of proposed sites - **a key regional recreational route**. All sites part of LCC's own designated Strategic Green Infrastructure Area.

A65 FULL and over-capacity

Concentrating more developments along A65 is unsustainable, dangerous and would be disaster for area including gridlock at ring-road. Made even worse by one-point access into some sites from unsuitable Knott Lane. Limited mitigation measures.

Wildlife habitats LOST

Many areas are UK Biodiversity Action Plan (BAP) Priority Habitats, hosting wild deer, bats, fieldfare, lapwing, curlew, sparrow hawk, tawny owl. Ancient Ghyll Beck runs next to a number of sites and Layton Lane fields will be brutally affected. All sites contain protected mature trees and woodland. Including a native bluebell wood and a UK BAP Priority Habitat pond with palmate newts.

Grade 3 farmland LOST

All sites classified Grade 3 agricultural land. Rawdon's several farms are major employers in the village which has a rich farming heritage. A bee-keeping apiary would be potentially destroyed, bringing the extinction of bees in the UK ever closer.

Basic errors in the Council's site sustainability and greenbelt assessments for all sites.

Major flaws in methodology of assessments. One of the sites allocated has a sustainability appraisal score of -7, the worst of all nearby sites. Greenbelt Assessment shows greatest impact compared with other sites, yet some sites are allocated while nearby sites are safeguarded. Why?

Not enough school places local schools heavily over-subscribed.

Potential alternatives have been overlooked:

North East Bradford - has the Council worked with Bradford Council to look at joint plan for bordering towns and villages?

Brownfield sites ARE available elsewhere across Leeds. LCC Core Strategy says itself that all these must be developed before greenbelt land.

Council has not revised its housing target in response to revised ONS projections which would mean city needs 45,000 and not current target of 70,000 - on which Council based its Core Strategy. A reduction in target of just 15,000 would remove need to take any land out of greenbelt.

Development NOT effective

Phasing of some sites completely UNDELIVERABLE

Highways access to your ref [HG2-12](#) is contingent on development of 'safeguarded' sites [HG3-2](#) and [HG3-3](#). But [HG2-12](#) is allocated for delivery earlier than these phase 3 sites. It has been

incorrectly categorised as 'allocated' and CANNOT be delivered.

Highways access LIMITED

Your ref [HG2-12](#): Only one access point into site via Southlands Avenue as other roads private, inadequate for 130 houses. Knott Lane is barely suitable for additional development. Frequent Crematorium traffic also uses Knott Lane, affecting all three sites close by.

[HG2-12](#), [HG3-2](#) and [HG3-3](#): Would collectively require realignment of Knott Lane but not serve them all adequately. Access issues onto congested A65 would remain and further deteriorate with increased traffic from significant housing developments.

Significant surface water flooding in some areas may make many sites undeliverable.

Development NOT legally compliant

No consultation on some sites PRIOR to it being allocated to housing in Site Allocations Plan.

Some sites not included in Issues and Options consultation in June.

NOT COMPLIANT with Statement of Community Involvement.

I was completely unaware the Council held a public consultation about their plans in 2013, or that this current public consultation was happening? Why?

Development NOT positively prepared

Site Allocations Plan for these Rawdon sites are not based on a comprehensive Greenbelt review as required by previous Inspector when he passed Core Strategy as sound. The selective (and *flawed*) greenbelt review undertaken by Leeds City Council means the Core Strategy and Site Allocations Plan are **UNSOUND**.

Development NOT in accordance with the National Planning Policy Framework

Especially chapters 9 Protecting Greenbelt, 11 Conserving Natural Environment and 12 Conserving Historic Environment.

By not considering alternatives (see above), the Council has not proved that '*exceptional circumstances*' exist to outweigh the harm that development would cause to the greenbelt sites here. The Council says that '*growth*' is the exceptional circumstance, but government ministers disagree.

Conservation and Heritage

Conservation areas are areas of special architectural or historic interest. Designation makes sure that change is managed so that the special character of the area and its setting is preserved or enhanced.

The Cragg Wood Conservation Area is protected through the Rawdon Cragg Wood Conservation Area Appraisal and Management Plan (2012), which means that it is a material consideration in the determination of planning decisions.

Effect on the Green Belt

The land occupied by many allocated sites and Safeguarded land on many other sites are all in Green Belt and form part of the narrow green corridor which serves to separate Leeds and Bradford along the south-facing slopes of the Aire valley.

The sites serve to separate the village of Rawdon in the north-west from the town of Horsforth to its south and east. They help to define the southern tip of Rawdon and preserve it as a distinct green village from the growing urban extension of Horsforth.

Meryl Alice Frazer