

From: [Julia Snell](#)
To: [Site Allocations Plan](#)
Subject: PDE03265_Objection to site allocation plan
Date: 15 November 2015 19:17:20
Importance: High

Dear Planning Inspector

I'm writing to you to explain why the Site Allocation Plan is unsound. I would also like to formally complain about how the consultation process was conducted by Leeds City Council (LCC).

The allocation plan is UNSOUND because more than 40% of sites are allocated on greenbelt or greenfield land. This is a complete contradiction to what has been discussed on a national level by the government. In Chapter 9 of the National Planning Policy Framework (NPPF) it clearly states in paragraph 79 and 80: "The Government attaches great importance to Green Belt. The fundamental aim of greenbelt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."

The Green Belt serves 5 purposes:

- To check the unrestricted sprawl of built-up areas;
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns;
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land."

The NPPF further states in paragraph 81, 82 and 83 that the Green Belts, once established, should "only be altered in exceptional circumstances" (paragraph 83).

Another government institution, the Department for Communities and Local Government, also makes it clear that allocating Green Belt land to accommodate local authority housing targets can NOT be considered an exceptional circumstance. However, that is what I was told during the consultation period by one of your senior planners.

The government makes it clear that the LCC can not use their own housing target as an argument for an exceptional circumstance. This makes the SAP unsound. National ruling and policy trumps local targets.

The NPPF also requires that the council gives special attention to the desirability of preserving character or appearance of Conservation Areas. In none of the lengthy documents published by the LCC can I find that this has been considered. Sites **HG2-12 (4254)**, HG2-1, HG2-2, HG2-5, HG2-9, HG2-10 are adjoining a conservation area and LCC has not carried out any assessment of the impact of building near the conservation area. This is another example that the LCC's SAP is unsound and inconsistent with national policy.

The SAP is further unsound because if all sites are developed as proposed there are several communities that will merge. Horsforth will merge with Rawdon if HG2-41, HG2-12, HG3-2 and HG3-3 are being built on. The same is true for HG2-1 and HG2-2 which will merge Guiseley and Menston. This is contradicting the NPPF and is not even consistent with Leeds' own Core Strategy.

The SAP is unsound because site hg2 -41 has previously been classed as 'strategic

green landscape' by the council. No further assessment of the site or any form of greenbelt review has been done by the council.

In addition, I am concerned that the Council appears to be allowing developers to cherry pick the most profitable sites to build on rather than thinking creatively about how to create affordable homes. I am aware that there are over 90 brownfield sites that were previously allocated for housing, but these have been disregarded because they would not make enough money for developers. How can the council justify this?

I am also concerned that LCC has overly ambitious plans for housing targets way in excess of the far bigger urban conurbations of Manchester, Birmingham, Liverpool. This is not in the best interests of the communities LCC is supposed to serve. I have major concerns regarding site HG2-41 for 777 homes, which directly impacts the community within which I live. LCC have not provided an adequate strategy for improving public transportation links and related infrastructure. How will the area accommodate 1000+ additional cars? And will the developer take responsibility for other infrastructure needs, in particular schools?

Finally, the consultation process has been wholly inadequate. I would not know anything about LCC's plans to entirely change my local area were it not for the efforts of local action groups. You have not attempted to communicate your plans with me in any way. At the event at the Horsforth library I asked one of your employees why I hadn't received written notification and was told that this would cost the council too much. I am far more concerned, however, by the cost to my local area and community of LCC's ill thought through plans.

Best wishes,
Julia

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