

3, Snaith Wood Mews
Rawdon
Leeds LS196SE

24.10.15

Dear Sir,

I strongly object to the Leeds City Council's proposed plans for new housing in Rawdon and Horseforth, I refer to the following sites:

HQ2-12 - Woodlands Drive Rawdon

HQ2-41 - Rawdon Crematorium Horseforth Roundabout

HQ3-2 - Knott Lane West Rawdon

HQ3-3 Knott Lane East Rawdon

HQ3-4 Layton Lane Rawdon.

I believe the planned development is not justified, not effective, not legally compliant, not positively prepared and not in accordance with the National Planning Policy Framework.

I have recently moved to Rawdon from Birmingham to an area Leeds Council had designated as a Special Landscape Area, a title richly deserved because of the stunning views. Now the intention is to spoil those distinctive

open valley views. As a previous visitor those views always took my breath away they were so beautiful. I marvelled that I was in a city (not open countryside) that could provide such views free for everyone, including sightseers from all over the world on their way to Ilkley and the moors. Surely they should be preserved to maintain the ethos for our following generations. Development of HG2-12 and HG2-41 would have a particularly bad visual impact and therefore cannot be justified.

HG3-3 is within the Rawdon Cragg Conservation Area and HG2-12 within its immediate setting.

Development of the sites would irrevocably again change the ethos of the area by marrying its setting and views which are intrinsic to its historic character as enshrined in the Cragg Wood Conservation Area Appraisal. It would be more logical to designate these two sites as conservation areas also as they would provide a safe haven for wildlife and a greenspace for leisure activities, should development of the other sites go ahead.

There has been no comprehensive greenbelt review as required under the Core Strategy and a vital area of greenbelt would be lost forever, blurring the gap between Leeds and Bradford encroaching into open countryside. This is unplanned urban sprawl. Rawdon's beautiful village identity would be gone. All the sites proposed are in the greenbelt ∴ not justifiable.

The Strategic Green Infrastructure of Aire Valley also lost forever, restricting the enjoyment provided by the area for walking, cycling, horse-riding and harming nature and ecology. Leeds Country Way runs through HQ2-12 and alongside HQ3-2 and HQ3-3, a key regional recreational route. All the designated sites are part of Leeds City Council's own designated Strategic Green Infrastructure Area.

Concentrating more development along the already heavily used A65 is unsustainable, dangerous and would be a disaster for the area. HQ2-41 with a school would cause gridlock at the ringroad, made even worse by one-point access into HQ2-12, HQ3-2 and HQ3-3.

from the unsuitable Knott Lane. Limited mitigation measures.

Wildlife habitats would also be lost. HQ2-12, HQ3-3 and HQ3-4 are UK Biodiversity Action Plan Priority Habitats, hosting wild deer, bats, weasels, fieldfare, lapwing, curlew, sparrowhawk, woodpecker and tawny owl. The ancient Ghyll Beck runs next to HQ3-4 Layton Lane fields and through HQ3-3 and HQ2-41. All the sites contain protected mature trees and woodland. HQ3-3 has a native bluebell wood. HQ3-2 is adjacent to a UK Biodiversity Action Plan Priority Habitat pond with palmate newts, also found in HQ2-12.

Grade 3 farmland would be lost. All sites are classified as Grade 3 agricultural land. Rawdon's several farms are major employers in the village which has a rich farming heritage. HQ2-12, HQ3-2 and HQ2-41 are regularly farmed. HQ3-3 is home to a family's small holding and a bee-keeper's apiary.

I believe there are basic errors in the Council's site sustainability and greenbelt assessments for all sites. Also there are

major flaws in ^{the} methodology of assessments e.g. H92-12 has been allocated even though sustainability appraisal scores it -7, the worst of all nearby sites. Greenbelt Assessment shows greatest impact compared with other sites, yet H92-12 is allocated while nearby sites are safeguarded. Why?

Development is further not justified as there are not enough school places, local schools are heavily oversubscribed. Potential alternatives have been overlooked e.g. Has the Council worked with Bradford Council to look at a joint plan for bordering towns and villages? Apparently Brownfield sites are available elsewhere across Leeds. The LCC Core Strategy says itself these must be developed before greenbelt land. The Council has not revised its housing target in response to revised ONS projections that would mean the city needs 45,000 houses and not the current target of 70,000 - on which the Council based its Core Strategy. A reduction in the target of just 15,000 would remove the need to take any land out of greenbelt.

I believe the Development is not effective.

1. Phasing of HQ2-12 is undeliverable. Highway access to HQ2-12 is contingent on development of 'safe guarded' sites HQ3-2 and HQ3-3. However HQ2-12 is allocated for delivery earlier than these phase 3 sites. HQ2-12 has therefore been incorrectly categorised as 'allocated' and cannot be delivered.

2. Highways access is limited. HQ2-12 has only one access point into the site via Southlands Avenue which is 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. Lengthy traffic queues would be inevitable.

3. HQ2-12, HQ3-2 and HQ3-3 would collectively require realignment of Knott Lane but would not serve them all adequately. Access issues onto the congested A65 would remain and further deteriorate with increased traffic from the significant housing development.

4. Significant surface water flooding in HQ2-12 could make the site undeliverable.

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I believe Development would not be legally compliant:

There was no consultation on site HQ2-12 prior to it being allocated to housing in the Site Allocation Plan.

HQ2-12 was not included in Issues an Options consultation in June.

It is not compliant with the Statement of Community Involvement.

I believe Development was not positively prepared:

Site Allocation's Plan for these Rawdon sites are not based on a comprehensive Greenbelt review as required by the previous Inspector when he passed the Core Strategy as sound. I believe the selective (and flawed) greenbelt review undertaken by Leeds City Council means the Core Strategy and Site Allocation's Plan are far from sound but are disastrously unsound.

I believe development is 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 the potential alternatives, already mentioned, the Council has not proved that 'exceptional circumstances' exist to outweigh the harm that development would cause to the green sites here. The Council say that growth is the exceptional circumstance but government ministers rightly disagree. Alternatives must be considered.

To summarise, development would mean no green belt, wildlife decline, farmland decline, loss of recreation, traffic congestion, no school places, pollution, queues for appointments as Rawdon's infrastructure fails to cope with such extreme development.

Of all the sites HQ2-12 is spectacularly ill-chosen for allocation as it borders Cragg Wood Conservation area. Its development is not justified, effective, legally compliant, positively prepared and definitely not in accordance with the National Planning Policy Framework. The question is why has it been considered at all?

Yours Sincerely