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10 London Lane
Rawdon
Leeds
LS19 6BR

4th November 2015

LDF Publication Draft Consultation
Forward Planning & Implementation
The Leonardo Building
2 Rossington Street
Leeds
LS2 8HD

DEVELOPMENT DEPARTMENT			
To	Action	Info	File
- 9 NOV 2015			

Re – Site Reference HG2-12 Woodlands Drive

Dear Sir / Madam,

I am writing to object to development on the site referenced above.

The Council pledged in its Park and Green Space Strategy to protect important green spaces and in this policy it recognizes that we all need places for relaxation, escape, exercise and recreation and that green areas provide a sense of community.

“This Strategy sets out the key priorities to 2020 in achieving a vision where quality, accessible parks and green spaces are at the heart of the community” LCC

Development will remove all of these benefits to the people of Rawdon and the surrounding areas, and these benefits will be lost forever.

The Council made this pledge to communities and it is has an obligation to honour this pledge; the green space of Woodlands Drive should not be considered for development.

As a resident of Rawdon I am appalled at the inclusion of so much of our green belt in Leeds City Councils Site Allocations Plans. This is an unjustified, unsound and legally non-compliant proposal for the following reasons -

This development is NOT JUSTIFIED

- Woodlands Drive has open valley views and is within **Leeds City Councils own designated Special Landscape Area**. It's also within the historical setting of the **Conservation Area** of Cragg Wood. How does this justify development?

Historic England state that the allocation of this site is an **“UNSOUND”** proposition for development. Copy attached.

“this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 133 or 134)” Historic England in their details to LCC 21/10/15

- To develop on this site would create urban sprawl and would ruin the identity and character of Rawdon village. It's a vital space that increases the biodiversity and sustainability of the local area - absorbing noise and providing drainage systems and countering pollution.

- How does Leeds City Council justify the impact on already stretched resources. This would be huge – schools, doctors, dentists - and there would be a huge impact on local roads, traffic levels, and state of, not to mention road safety issues and highways access. There is only one access point for 130 houses, which also serves the Crematorium. Infrastructure should be in place BEFORE housing and no guaranteed plans have been put forward to accommodate this.

- The site offers an open recreational space for the community to exercise (walking, dog walking, horse riding, running). **Leeds Country Way** runs right through this site. It's a unique facility where people can relax and escape – proven to improve people's overall well being.

It is estimated that by 2020 half of all our children could be obese and there is evidence to show that access to places like Woodlands are vital for physical activity and development.

- How can the Council justify the removal of a wildlife rich habitat, which is recognized as a **UK Biodiversity Action Plan (BAP) Priority Habitat**? A habitat supporting wild deer, bats, sparrow hawks, tawny owls and kites. Rawdon has a rich farming heritage and this land which is currently farmed, is also classified as **Grade 3 agricultural land** as well as being a local employer.

- There are opportunities for housing around Leeds in existing buildings, premises and land that are currently derelict and empty, and which would be more suitable for housing – the infrastructure is already there to support these.

Between 2004 and as at September 2015 (15,327) there have been between 15,000 – 17,000 empty properties city wide. (Data from LCC Data Mill).

Whilst I recognize there will always be a certain amount of empty houses (timescales of people and movement of) this has been a consistent figure since 2004 and could potentially save our green spaces.

Plus, the Core Strategy states that all **Brownfield sites should be developed before greenbelt land**. The Council is effectively allowing developers to cherry pick the most desirable and profitable sites without any consideration for communities.

This development is NOT EFFECTIVE nor has it been POSITIVELY PREPARED -

- The plan for the site is not based on a **COMPREHENSIVE Greenbelt Review** as required under the Core Strategy.

- These plans do not take into account our needs as a community or with our full involvement. Without local action groups we would not have been aware of these proposals.

The local library (Rawdon) were **supplied the wrong maps which is misleading and inaccurate (Aire Valley maps not Aireborough)**.

The Council POP ups were insufficiently advertised locally and there was no literature posted direct to residents. The Council's website does not allow for objections of greenbelt development across Leeds – it forces the user to focus on one site at a time making commenting on more than one objection impossible.

Our younger population – our future - has also been left in the dark – there was no inclusion in popular social media or local schools and 35% of the Leeds population has been omitted from this consultation because they are not on line.

This development is NOT LEGALLY COMPLIANT and is NOT IN ACCORDANCE WITH THE NPPF

- The housing target of 70,000 on which the Council has based its Core Strategy is inaccurate and over aspirational and the Council has not revised these figures despite ONS projections of 45,000. The Council has also IGNORED the NPPF which states that green belt only be used in “exceptional circumstances”. The Council cites “Growth” but this is an unproven circumstance. Greed as far as I am aware is not an exceptional circumstance.

- Site HG2-12 was NOT included in the Issues and Consultations consultation in June. Nor was there any consultation PRIOR to it being allocated to housing in the Site Allocations Plan. This is a breach of the **Statement of Community Involvement** leaving residents confused and misled by changes in site allocation.

This proposal cannot be take in isolation. Yeadon, Guiseley, Rawdon and Horsforth are all being subject to this unjustifiable plan and all our green spaces are being threatened.

Section 9 of the NPPF serves to protect greenbelt and this is being ignored by Leeds City Council across Aireborough.

Too much green space is being used to meet unproven targets, and sites are being allocated that contravene NPPF guidelines. These sites are recognized by notable, expert organisations and have been decreed green status for good reason.

HG2-12 should not be included and I hope that the Council listens to our community and rejects any proposals on greenbelt sites.

Please keep me informed of any opportunities to present my objections to the planning panel, the plan submissions and the potential outcome of the review.

Regards,

Erica Ward

Page	Site	Sound/ Unsound	Comments	Suggested change
65	HG2-12 Wood-lands Drive, Rawdon	Unsound	<p>This area adjoins the boundary of the Rawdon Cragg Wood Conservation Area..</p> <p>By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the character of the Conservation Area or what harm might result to those elements which contribute to the significance of this designated area by its eventual development .</p> <p>Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition, the Council has a statutory duty under the provisions of S72 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay “special attention” to “the desirability of preserving or enhancing the character or appearance” of its Conservation Areas. The NPPF makes it clear that the significance of heritage assets, such as Conservation Areas, can be harmed through development within their setting.</p> <p>In the absence of any assessment of the degree of harm which this proposed Allocation might cause to the Conservation Area, or, indeed, what measures the Plan might need to put in place in order to ensure</p>	<p>(1) An assessment needs to be undertaken of the contribution which this site makes to the elements which contribute towards the significance of the Conservation Area and what impact the loss of this undeveloped site and its subsequent development might have upon those significances.</p> <p>(2) If it is considered that the development of this site would harm elements which contribute to the significance of the Conservation Area, then the Plan needs to set out the measures by which that harm might be removed or reduced.</p> <p>(3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of the Conservation Area, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 133 or 134).</p>

Page	Site	Sound/ Unsound	Comments	Suggested change
			<p>that this harm is minimised, the Plan cannot demonstrate that the allocation of this area is compliant with, either, the statutory duty placed upon the Council under the provisions of the 1990 Act, or the requirements of the NPPF.</p> <p>Before allocating this area, therefore, there needs to be an assessment of the contribution which this currently-undeveloped area makes to the character or appearance of the Conservation Area, and what effect the loss of this site and its subsequent development might have upon the elements which contributes to its significance.</p>	

Area Proposals 2 - City Centre

We have the following comments to make regarding the proposed allocations in this part of the City:-

Page	Site	Sound/ Unsound	Comments	Suggested change
85	HG2-187 Brandon Road, LS3	Sound	<p>This site lies within the Hanover Square and Woodhouse Square Conservation Area. Waverley House at the south-east corner of this site is a Grade II Listed Building.</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of these heritage assets in line with the statutory duty under the 1990</p>	-