

PDM 01312

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12 November 2015

**OBJECTIONS TO LEEDS SITE ALLOCATION PLANS**

Dear Sir/Madam,

Re: Sites No. HG2-12 and HG2-41

I am writing to object to the plans to allow development of the above sites.

I have lived for over 30years in the area bordering site no HG2-12 and so have the experience to comment on the value of both these sites to the community of Rawdon , Aireborough, and Leeds as a whole. In addition I worked for Leeds City Council for over 25 years with vulnerable and needy children and families within the Leeds Area. I am aware of the necessity for good, appropriate housing for citizens at all stages of their lives. My objection is not nimbyism, which I am sure will be a complaint levelled at my objection.

Within the Aireborough region there have been hundreds of houses built in recent years – on the sites occupied previously by factories, mills, and a large mental hospital – all brownfield sites rightly used to provide necessary housing. The impact of these extra households has been felt on the infrastructure – the roads, schools, doctors, social services, and other services. Some attempts have recently been made to try and alleviate the highway problems with minor changes to roundabouts on the ring road and the introduction of bus lanes. With the continual growth of the population these attempts have had some minimal effect. The population of this area of Leeds cannot be accused of nimbyism.

I would also like to comment on the type of housing being built. The need for smaller homes has been identified as a need for this area. But the need for smaller “starter” homes and “Downsizing” homes of one and two bedrooms are not particularly addressed by the new builds. Most of the properties built appear to be 3, 4, and 5 bed roomed executive homes – not those likely to be afforded by first –time buyers.

The themes I would like to comment on are:-

- (1) Ecology/Landscape/Trees
- (2) Conservation
- (3)Highways/transport
- (4)Local services/facilities
- (5)Loss of Greenbelt

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To	From	Date	File
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I will then comment on "The Soundness of the Plan" as requested in the Response Form

### (1) Ecology

The above sites form part of a "green corridor" through Leeds which is vital for the continued use by wildlife. The need for people to connect with their environment in a positive way is essential for well-being. The sites are in an area designated by Leeds City Council as a "special landscape area". The views across the Aire Valley would be harmed forever with development of these sites.

The habitats of birds and small mammals would be destroyed in such development. This area has bluebell woods, agricultural land and many mature protected trees. Deer are sometimes seen in the area – I have seen deer in the early morning in the HG2-12 area. All this would be lost in such development.

Leeds Country Way runs through HG2-12 an important route for walkers, cyclists, and horse-riders. Any development would cause damage to nature in this landscape and impact on the ecology of the area.

Natural, green areas are necessary for the health of a population living near large cities and towns. Leeds has recently been named as a city with a growing problem of air pollution, and green spaces with trees are vitally needed to be the "green lung" in such a situation.

Open, quiet places are also needed for the mental health of citizens living in urban conurbations. Places to walk, to relax in, and to unwind in, are essential for mental health. Young children need to be able to have contact with the natural world to enable them to develop in a healthy way. The ecology of this area" the connection of humans with their environment" needs to be protected. The plan does not help with such protection.

### (2)Conservation

HG2-12 is a site that contains many protected , mature trees. The Cragg Wood conservation area is in the immediate vicinity of HG2-12 and development would have a negative impact on this particular area and its characteristics. Both sites I have named are either next to, or close to, the sacred grounds of Rawdon Crematorium. The grounds are very important to those who come to remember loved ones and seek a peaceful space to do so. Development of these sites would impact greatly on these grounds.

### (3)Highways/Transport

The A65 is one of the most congested roads in the Leeds area, if not in the country. Its gridlocks are frequently mentioned in the BBC radio 2 national traffic news( not just on Radio Leeds)!Building along this road has resulted in traffic jams into/out of Leeds at peak time, and with very slow traffic in particular places at all times of the day. To drive between Menston and the City Centre involves negotiating many bottle necks – at Guiseley, between Rawdon and the Horsforth ring road, and through Horsforth on the A65. The damage to health and the increased costs of transport through loss of time must be immense. That is the current situation which has been addressed in some part by alterations to the Horsforth ring road roundabout which have had partial success now. However to add further traffic on this congested road would only further exacerbate the problems.

## Transport- Trains

To get a train into Leeds from Rawdon and to avoid using the car or bus is impossible. Stations are situated at Horsforth, Kirkstall (soon to be open), Apperley Bridge (soon to be open). To get to all of these would involve driving and parking. To park at Horsforth Station involves getting there before 7.30 am because of difficulties with parking. To park at Kirkstall will still involve getting through the Horsforth bottlenecks. The new station at Apperley Bridge will have additional pressure from Bradford travellers. All these transport options are overcrowded now and will be worse with further developments.

## Transport – Buses

The service regularly gets caught up in traffic congestion. I have been on journeys from Rawdon that can take 45mins or more to get into the centre of Leeds. Bus lanes have been added which have made some improvements but they are intermittent on that route along A65 often returning to single lane traffic. Any further pressure on buses from more housing development, would be problematic.

## (4) Local services/facilities

At the moment parents have problems getting their children into local schools, and doctors surgeries are extremely busy. The infrastructure does not exist to cope with larger numbers.

## (5) Loss of Greenbelt

Greenbelt was introduced to serve five purposes:-

- (a) To check unrestricted sprawl of built-up areas. These developments would mean the loss of a vital green corridor – Horsforth and Rawdon would be joined up. This would then be part of a joined-up area from Kirkstall through to Menston. It would involve the loss of individual characteristics of the towns, loss of leisure areas, loss of green space for a very wide area.
- (b) To prevent neighbouring towns merging. Again Horsforth and Rawdon would merge and a growing danger that Leeds and Bradford as large cities would merge if these proposed developments go ahead.
- (c) To safeguard the countryside. The Aire Valley “Special Landscape Area” needs to be protected. Proposed development will cause damage to the countryside as highlighted at Section (1) Ecology of my objection.
- (d) To preserve special historic towns such as Horsforth, Rawdon, and Yeadon. This would be lost with development of HG2-12 and HG2-41 by making them all part of one conurbation.
- (e) To assist in urban regeneration by encouraging the recycling of derelict and other urban land. This has already been done in Aireborough with the result that there are few, if any, brown-fields sites left in Aireborough. To start building on greenbelt is not sustainable development. The purpose of the greenbelt is to encourage regeneration and there are many brownfield sites to be developed in Leeds.

Greenbelt was supposed to be “permanent” unless “very special circumstances” exist. Leeds has not got those circumstances because there are undeveloped brownfield sites in areas around the city.

On 3 February 2015 Brandon Lewis – Minister of State, Department for Communities and Local Government said “the greenbelt is a legitimate constraint on development. It is listed as an environmental constraint within the National Planning Policy Framework.....the government attach the highest importance to protecting our green belt”.

The loss of greenbelt would be contrary to the National Planning Policy Framework – section 9 of sustainable development, and also contrary to chapter 11 of sustainable development.

In objecting we have been asked to comment on the soundness of the plan by addressing the following questions.

#### Is it justified?

Leeds City Council has used out of date figures to set targets for new housing. A figure of 70,000 new homes by 2028 has been set . The 2011 census shows that the population of Leeds is only likely to grow by 64,000 people in the same period. I believe that the use of the figure of 70,000 new homes is inconsistent with both the National Policy Framework and the Core Strategy. I therefore object to the plan in that it is not justified. As stated earlier there are brownfield sites unused in Leeds and therefore the plan is not justified. The Leeds Core Strategy also states that all brownfield sites must be developed before greenbelt land so the plan is also contrary to the Leeds Core Strategy and is not justified.

#### Is it effective?

Site HG2-12 cannot be delivered because of problems with an access point for 130 homes. The site is surrounded by a private road, and two narrow public roads, Southlands Ave and Knott Lane. Knott Lane is the only exit point from the Crematorium. Following funerals the congestion at the top of Knott Lane junction with the busy A65 is severe. HG2-12 when added to by HG3-2 and HG3-3 will require a realignment of Knott Lane to make the visibility and therefore the safety of the exit to A65 improved. This makes the delivery of HG2-12 impossible until this work is done – and this is not planned until after HG3-2 and HG3-3. Therefore HG2-12 is not deliverable at this stage.

Also there is frequent flooding in HG2-12 and this may make the site undeliverable.

Because of these points I feel the plan is not effective.

#### Does the plan agree with the policies of NPPF?

I have stated that I don’t believe that Leeds City Council have shown “exceptional circumstances” exist to develop on Green Belt land . Housing Minister has said that protection of the greenbelt is “higher” than housing targets. The plan does not agree with chapters 9, 11, and 12 of NPPF.

#### Was the plan positively prepared?

I don’t believe it was. The site allocation plan was not based on a comprehensive greenbelt review as required by the Inspector. It doesn’t agree with the policies of Core Strategy because brownfield

sites are not being used before greenbelt. In Aireborough 79% of proposed housing will be on greenbelt including HG2-12 and HG2-41.

Was the plan legally compliant?

There was no consultation on site HG2-12 before being allocated to housing in Site Allocation Plan.

I understand there should have been a statement of Community Involvement and I was not aware of public consultation about their plan in 2013. It is also my view that this current public consultation was poorly advertised.

For these reasons I believe the plan was not legally compliant.

Summary

For all the reasons stated above I strongly object to the Site Allocation Plan. Please let me know about the Public Examination and keep me notified of the submission of the plan and the potential outcome of the plan.

MRS M. A. BARBER