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Karen O'Neill
18 Haighside Way
Rothwell
Leeds
LS26 0UG

LDF Publication Draft Consultation
Forward Planning & Implementation
Leeds City Council
Leonardo Building
2 Rossington Street, Leeds LS2 8HB

DEVELOPMENT CONSULTATION			
To	Scheme	Ref	Date
13 NOV 2015			

10/11/2015

Dear Leeds City Council,

REF: HG2-173

I do not support the proposed allocation of the Haighside development site, **ref: HG2-173** and I believe its inclusion in the Site Allocations Plan renders the plan Unsound, Unjustified and Ineffective rendering it not legally compliant.

My concerns are many and I will endeavour to write these down for your attention, I will also attach some relevant paperwork which will explain in more detail my concerns.

Development of the **Haighside** site would reduce the important Green Belt gap between the settlements of **Rothwell & Robin-hood**, effecting the health and well-being not only of the people of Rothwell & Robin-hood but also of the protected species of animals and other animals that live in this area. It would also have an unacceptable impact on the existing community in terms of access through the woodland and walkways in and around this area.

The development of the Haighside site will have a serious environmental impact on the wildlife (protected species or not) that habitate within all the woodlands that surround this area.

There are also the water courses that run through this site which would have ecological constraints to any development in this area.

There is the removal and replacement of the electricity pylons, which would have to be done before any development could be done.

Both of these issues will have a significant effect on the number of dwellings which may be delivered, meaning the **SAP** will be ineffective in delivering the housing requirement in the **Outer South HMCA**.

The lands to the south of the Haighside's, St Georges and Manor estates has been and still is used by generations of Rothwell, Carlton and Robin-hood residents for walking their children, grandchildren, pets and to continue with **Urban Sprawl by Leeds City Council**, this will be detrimental to all and have an effect on the health and well-being of these residents and their children.

I have given an alternative site (North & East HG2-174 & West & North HG2-175) for you to look at in the attached paperwork, which I think would be ideal for the council to fulfil their quota, without total disruption to the roads and to stop continuous urban sprawl and save the greenbelt.

Kind regards,

Karen O'Neill

Proposed Site:

Haighside HG2 – 173.

Ecology / Landscape/Trees

- Sites 1058 and 1049 are linked by a small wooded Area – Haighside Wood which is a self contained area rich in aspects of plant and wildlife and is potentially a community asset.
- The wood is joined to the proposed Haighbeck Green Corridor which has potential links to the South Leeds Green Corridor. The Council recognises the natural assets of this area and has proposed a 20-30m barrier zone along each side of the beck and around the wood.
- The site 1049 is also marked by a number of railway embankments/cuttings which are now footpaths / wildlife links but are also part of the areas mining heritage when the wood was originally a mine and still contains 5 shafts.

Heritage

- As above

Highways and Transport

- Site included in Phase 2 – Not to start until NGT complete. Present information on NTG indicates that scheme will not be complete on programme due to Public Enquiry time scale and subsequent procurement problems.

The Proposal is 'not effective' since it is based upon an infrastructure procurement Process which is not within the control of the Council.

- The NGT system will not provide any tangible benefit to the site or Rothwell. A link to Rothwell could only be provided as a second scheme and business case. It is therefore unproductive to locate the proposed number of dwellings in an area devoid of transport facilities.
- The Site is on corner of Wood Lane and A61 and gaining access onto either main road is not practical due to present traffic problems. The road alterations for the recent St Georges Development [285 dwellings] were not adequate and a further 661 dwellings is not realistic or 'effective'
- The plan proposes using an existing road, Low Shops as a secondary access to the development. It is not appropriate to use an existing access to an adjoining development which was not designed or suitable for supporting such a large additional development. Due to the problems of access onto the A61 the low shops secondary access will become the main egress point for the site in the morning rush hour and this will be in tolerable for residents of Low Shops Lane.

At the 2013 consultation the Forum put forward a detailed methodology for considering sites and made objections to Haighside being used as an access to Wood Lane. Despite being

a Neighbourhood Forum the Council did not engage in any discussions regarding the response. There has been no information as to why despite these concerns the Council consider it acceptable to provide an access to nearly 600 houses through an existing estate and the proposal must be considered not " **justified** 'since there has been no other choices provided or alternatives proposed or evidence of participation with the local community.

Local Services

- There are no local services or facilities in the Northwest quadrant of the Rothwell Settlement despite it already having the largest proportion of residents together with an industrial estate other than a sub post office and two shops and a church and scout hall.

The proposal to increase the number of dwellings on this scale in such a limited area cannot be ' **justified** '

Schools

- There are insufficient junior school places for the present population as a result of the recent St Georges Development and the present figures only balance by some children being sent to Robin Hood school which has had an extension and to Middleton. Neither of these solutions are acceptable in terms of traveling.

A further 578 dwellings on Haighside plus 83 on the Garden Centre Site requires a new 2 FE Junior school. [Site Allocation Plan – Housing and Safeguarded Land- Jan 2015] In this report to the Development Plan Panel the new school was agreed for site 4222 at Fleet Lane. A site as far away from St Georges as possible within the Rothwell Settlement. An alternative to be considered further was site 3081 at Robinhood.

- The plan cannot be considered sound or ' **justified** ' when a need is identified which relates to the site and the solution to meeting this need by providing addition school places is provided at the opposite end of the settlement. Sufficiently far away as to not comply with the Core Strategy's Accessibility Standards.

The alternative proposal of site 3081 at Robinhood for a school to meet this need is also not **sound** because of its distance from St Georges.

The alternatives are – either provide a school associated with St George's or provide the new 661 dwellings presently associated with St George' s where the proposed sites for the new schools are.

- The proposal is also not **sound** or **justified** using the Planning Inspectorates criteria p.6 in that in 2.8 to be justified the DPD needs to be founded on a robust and credible evidence base involving – ' evidence of participation of the local community and others having a stake in the area.' There is no evidence of the local community participating in any discussions regarding the provision and siting of an additional primary school and yet two schools are indicated on the plans.

Site Boundary

- The boundary of the site 1058 shown on the Council's drawing included as part of Section 3 item 8 Outer South presented to the Development Plan Panel 16 June as part of the Site Allocation Plans- Publication Draft is incorrect in that it includes an adjoining area of land which is part of the Haighside Development and was designated on the planning application as open space for that development when it was built during the 1970's.
- This matter was raised by the Rothwell Neighbourhood Forum as a comment during the 2013 Site Allocation Plan response during the public consultation and separately in correspondence with the planning department and in meetings with officers of the Forward Planning Department and the specific area has been identified on drawings submitted on earlier occasions. The area backs onto houses 2 to 34 Haighside Way 17 dwellings and is therefore of a significant size.

Despite all these representations and no response whatsoever from the Council the area has again been included as part of the site proposed for development. The main eastern boundary of site 1049 is in the ownership of the Council and is formed by a wooded margin /footpath which was previously a railway line and should be retained.

The Council has clearly not taken any account of previous representation and has defined the site area as 22.03 hectares and 578 dwellings as before. The proposal cannot therefore be **sound** or **justified** since it is based on an incorrect area and dwelling number and there is no evidence that the Council has engaged in participation with the local community.

Loss of Greenbelt

- The two sites are classed as Greenbelt in the Council's site database with 51.41 grade 2 agricultural lands and 33.45 grades 3. And 15.14 Urban. The sites include woodland / trees and hedgerows. Together with a beck which feeds a large pond / fishing lagoon and subsequently the start of the Oulton Beck.

Due to these features within the sites they are well populated by a wide range of wildlife.

- The Council's site database indicates that development would not lead to the physical connection of settlements.

This statement is however questionable. The southern boundary of the proposed development extends the boundary of the Rothwell Major Settlement to within a short distance of the Robinhood minor settlement and between these two boundaries are industrial Sites 4231 and 1006 both directly accessed and have frontages on the A61.

The positions of these two sites have not been clearly recognised in the Plan but they virtually connect the two settlements. The Plan should seek to keep the maximum space between the two settlements not encourage the reduction and eventual loss of this valuable greenbelt space. There are alternative sites to develop within the area which will not jeopardise this loss and they should have been considered.

There is no evidence that has been made available to indicate a process that has been carried out by the Council to consider alternative sites to Haighside. There has been no consultation by the Council with local residents for their views on this matter and there was no response by the Council following the 2013 SAP Consultation when the Rothwell Neighbourhood Forum and local residents opposed this proposal.

The proposal cannot therefore be considered **sound** by the fact that it has not been **Justified**.

Part 3. - Is the Plan sound.

3.3 Why we think the Plan is unsound

The proposed site is considered to be unsound in that it is:

- Not Justified
- Not Effective

When considered against the following headings.

Highways / Transport

To be justified the proposed use of the site must be founded on a robust and credible evidence base involving evidence of participation of the local community and the most appropriate strategy when considered against reasonable alternatives.

The proposed access to the site is from Wood Lane which also provides the vehicular access to the St Georges Gate residential development on the South side of Wood Lane opposite the Garden Centre. The St Georges development has only recently been completed and provides 285 residential units. Both these sites and the adjoining Pelican Industrial Units Site are only a few hundred yards from the junction of Wood Lane with the Leeds Wakefield Road A61. At the Jaw Bones junction.

At the time of the St George's development seeking planning approval concern was locally expressed regarding the increase in traffic onto the A61 junction. These were ignored other than the provision of traffic lights when in effect the junction for Wood Lane also required to be modified to include a second lane for left turning traffic.

The junction will be further surcharged by the Garden Centre site and another proposal in the Councils Site Allocation Plan for sites 1058 and 1049 will make this junction untenable.

The Councils answer in the SAP is to delay the 1058 and 1049 sites from being developed until the proposed NGT is in place. From discussions the Forum has had with the West Yorkshire Combined Authority we have been advised that the new park and ride terminal associated with the trolley bus scheme will be sited in Stourton and will have no effect on the St George's area transport problems other than increasing the traffic on the A61 bringing additional passengers to the Stourton interchange making the junction even more difficult to access.

One of the main problems at present is traffic backing up from the present Stourton M1 interchange and blocking the egress from Wood Lane.

The only solution to the **present** problem is an improved junction and a dilution of the traffic from the junction to the Stourton Interchange. In order to improve things in the future there must be **NO more** traffic than there is at present on Wood Lane.

The Council's agreement to the proposals associated with the existing St Georges Development at the Jaw Bones junction was not **Justified**. The Councils proposals to develop the adjoining area by a further 83 units for the Garden Centre site and a further 585 units for Haigh side 661 in total is **Not effective** in terms of the Test of Soundness in that to be sound the proposal must **have Sound Infrastructure delivery planning**, which clearly it does not have?

Using the Councils approach which is based upon the trolley bus scheme solving the problem there is no grounds for assuming this is the solution but the scheme is presently held up in a public enquiry and the chances of this being delivered on time is unlikely to say the least which again is an example of poor infrastructure planning. We were advised by the West Yorkshire Combined Authority that the only possible solution to the problem would be an additional leg of the trolley bus service through Rothwell to Oulton but ignoring the technical problems this would need a new business case and a separate scheme and an additional timescale.

To be considered justified the proposal should also be able to demonstrate evidence of participation of the local community and others who have a stake in the area.

This has not been the case despite requests earlier by the Neighbourhood Forum for meetings with the relevant planners to discuss feedback from the 2013 consultation and more recently a meeting with the Councils Highway Engineers to discuss the highway problems at the A61 junction. Whilst this was agreed by Highways the meeting was blocked by the Councils Forward Planners. Clearly therefore the proposal cannot be considered **Justified** in terms of Highways and Transport and community involvement.

Schools.

The completion of the St Georges development resulted in primary school places being inadequate and some children being placed at schools across the M1 Motorway in Middleton. From meetings with Education Leeds representatives the Forum has been advised that as a result of the completion of two new classrooms at Robin Hood the situation in Rothwell is at present in balance overall.

The Councils Site Allocation Plan despite proposing a further 661 dwellings for the St Georges area does not make provision for a school in this locality. A 2 FE school is proposed at Oulton but this is outside the Accessibility Standards set by the Council in their Core Strategy.

The issue of the need for additional primary school places was raised as an objection to the proposals for 1058 and 1049 sites in the 2013 consultation but the Council have been unwilling to discuss feedback with the Forum. The proposal to develop site 1359 etc. is therefore not *Justified* by the Council being unwilling to provide additional school places within the access criteria they have set.

Local Services / Facilities.

There are no local services or facilities within the St Georges area and the proposal to develop further either the Garden Centre site or the Haighside site are not *Justified*.

The Council are aware of the infrastructure limitations on this particular area but have done nothing to improve the situation or to discuss the problems or potential solutions with the local community or the Neighbourhood Forum.

3.4 Changes we consider necessary to make the Plan sound.

The changes we consider necessary to make the plan sound would be either to

- Remove the proposal to develop the Garden Centre from the SAP [and also the Haighside sites]

or

- To provide vehicular access to the Garden Centre site from an alternative source. This would still require the lack of school/local facilities to be addressed. It would also due to the size of the area involved provide sufficient space for the Haighside sites to be also relocated in this area.

Alternative Access.

There were a number of sites in the earlier SAP behind the Garden Centre site [3079 ; 3080] Which were not able to be developed due to limited access to the main road? In addition site 1335 had similar problems.

The main problems with developing the Haighside sites was the access problem and the closing of the green space between the Rothwell and Robin Hood Settlements and also the inadequate primary school places or a site to provide a school.

The area of land behind the Garden Centre designated as Rothwell Haigh on the OS sheet would provide a more than suitable alternative for future development. The site is bounded to the South by the Rothwell Settlement Boundary to the North by the M1 Motorway to the East by the A639 dual carriageway and to the West by the A61 and the Pelican Industrial Estate.

The site could be developed by obtaining access to the A639 the Council owning most of the frontage. Assuming a deep green margin parallel to the motorway the site over time could provide all the residential space required plus a primary school site and other local services.

A Northern development away from the Settlement boundary will have little effect on the visuallity of the site because of the steady reverse slope away from the adjoining residential area.

4.3 Why we consider the plan is not legally compliant.

We do not consider that there has been any appropriate consultation on this proposal and whilst it has been pointed out separately by the Neighbourhood Forum that the councils Statement of Community Involvement is considered to be not legally compliant in this respect and others the Adopted SCI does set out requirements for the involvement of the local community which have to a large degree been ignored

With regard to this site and the adjoining sites 3079 and 3080 the Forum made proposals as part of the 2013 SAP consultation for these sites to be combined as part of a development associated with the adjoining industrial site with the option of an alternative access.

The council were unwilling to discuss the matter or to provide feedback on the proposal and these sites have been omitted from the 2015 SAP again without feedback.

This is contrary to the adopted SCI which states p.9 that *" in all cases the LCC will involve stake holders at the earliest practical possible point. " And " LCC will make feedback available to you on comments received "*

If the Council are unwilling to follow their own policy then their actions cannot be considered *legally compliant*.

10.11.15