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

12<sup>th</sup> November 2015

## Objections to Leeds City Council's Site Allocations Development Plan

I would like to voice my formal objection to the housing allocation plan put forward by Leeds City Council.

The points below all relate to:

HG2-12 (4254)	Woodlands Drive
HG2-41 (4240)	Rawdon Crematorium – Horsforth Roundabout
HG2-46	Horsforth (formally waste water treatment works)
HG3-2	Knott Lane West
HG3-3	Knott Lane East
HG3-4	Layton Lane

I have also noted specific objections to each site in turn.

The interactive map of sites link that the council have posted on their website does not open (I have tried repeatedly). How can we object if we cannot see where the proposed sites are?

The proposed sites are not justified. The housing figures quoted by Leeds City Council were based on 2008 ONS statistics of forecasted population. These figures have proved to be inaccurate. Instead of the 70,000 (or 66,000 new

build) proposed, it should be much lower. The NPPF says the legal requirement is to use the most up-to-date statistics available.

35% of the Leeds population has no access to the internet or email. If the Council have notified Leeds residents of their future housing proposals electronically, how can the response they get be representative of the views of Leeds as a whole?

I agree with Historic England (letter reference HD/P5114/04), who has declared the Plan as unsound, saying that the development would harm the significance of Conservation Areas, and that insufficient assessments have been completed. The public benefits do not outweigh the harm (NPPF, Paragraph 133 or 134). 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.

All the sites reside within LCC's own designated Special Landscape Area, and development of these sites would permanently spoil the open Aire Valley views and special character of Rawdon village and the Leeds/Bradford green corridor. The vital gap between Leeds and Bradford would be lost at this geographical location – this is urban sprawl, contravening the NPPF's specifications.

The Plan for all of the sites have not been positively prepared. There has been no comprehensive Greenbelt Review for any of the sites, as detailed in the Core Strategy. The greenbelt review that has been undertaken by LCC is selective and flawed. This means that the Core Strategy and the Site Allocations Plan are unsound. Ironically, all of the proposed sites are part of LCC's own designated Strategic Green Infrastructure Area. Go figure.

There are basic errors in LCC's site sustainability and greenbelt assessment for all sites.

The proposed sites are not compliant with the National Planning Policy Framework (NPPF). The site allocations are unsound as to the huge impact of them on the current historic environment. I would like HG-12 and HG2-41 removed from the Allocation Plan, and HG3-2 and HG3-3 removed from their current PAS status and returned to their original greenbelt status.

Brownfield sites are available. When I asked a member of Council planning why these weren't being used first, he said that '...developers didn't want them'. When pressed, he admitted that the Council '...were over a barrel' with regards to the developer's demands. Please do not let this continue! Petition central government to step in and stop this! The LCC Core Strategy says that brownfield has to be developed before greenbelt. And what about the existing empty homes? According to the social enterprise Leeds Empties, there were over 10,000 empty homes in Leeds. Bringing these back into use would mean that there would be less demand for new properties. Why isn't central or local government incentivising landlords (and themselves) to try and reduce the 20,000 people on the waiting list for council housing, and also not eating into precious greenbelt? Once greenbelt has gone, it's gone forever.

The Plan is not legally compliant. LCC had a Public Consultation about the proposed sites two years ago, which I wasn't made aware of. Neither were my neighbours or other people living locally. I only found out about this via local campaigning groups. According to the Council's Statement of Community Involvement, they have a legal duty to consult with the public. I also did not know that in June or July 2015, there was an Issues and Options stage of the consultation, where these sites (and others) were put forward. Furthermore, I haven't been regularly consulted or listened to about housing developments in my area by the Council, apart from a copied and pasted email from them, saying '...wait for the Public Consultation'. This is not 'engaging with communities to shape where we live'. This surely contravenes the National Planning Policy Framework (NPPF) and Leeds City Council's Core Strategy, and must be considered a breach of legal duty.

Developers have met with senior Council executives and planners frequently over the last five years to plan and decide how to shape communities, and to choose sites that the developers would prefer to build on. Developers have also been consulted by the Council as to where to build new developments without (again) consulting or engaging with the local communities who will be directly affected. This is a fact. If you need evidence, please ask the poor local community groups who are working tirelessly on the behalf of their communities to raise awareness of the illegal and underhand practices being used by both LCC and the developers.

The Plan is not in compliance with the Statement of Community Involvement (SCI). They haven't carried out consultation consistent with the SCI. The Council has not subjected the Plan to sufficient and accurate sustainability

appraisals. The Plan does not conform to the Core Strategy. I have found no evidence to suggest that the Plan has met a Duty to Co-operate with the neighbouring authorities (i.e. Bradford Council).

The Plan is not effective. All the sites are classified as Grade 3 agricultural land, and the area has a rich farming heritage. Local schools are already over-subscribed (e.g. Horsforth School). Other reasons for the plan not being effective are given for each site reference below.

None of the sites are consistent with national policy for many, many reasons – the main ones being that there are brownfield sites that can be developed before greenbelt, and that the Council have not proven that they have 'exceptional circumstances' to develop greenbelt land.

## HG2-12 Woodlands Drive

This site is not legally compliant. It not included in the Council's Issues and Options consultation stage, and this is a breach of its legal duty. This site scores 7 in the sustainability scores, the worst of all nearby sites. There are major flaws in the methodology of assessments.

To build on this site, the development of PAS sites HG3-2 or HG3-3 would be required for access. As these sites are 'Protected' until 2028, and HG2-12 is supposed to be developed in an earlier phase, how can that be possible?

Leeds Country Way runs through this site, which is a key regional recreational route.

The Council have assessed this site incorrectly – in the box saying 'Areas of protected/unprotected woodland/tree/hedgerows', they have stated 'No'. If they had actually visited the site, they would have noticed ancient trees and abundant hedgerows. Additionally, this site scores 7 in the sustainability scores, the worst of all nearby sites. There are major flaws in the methodology of assessments. It also has the greatest impact on greenbelt, according to the Greenbelt Assessment, but it has not been safeguarded. The Council also claims that the site is '...surrounded on three sides by development'. This is simply not true. There is no development to the west or south, and only partial (carefully screened low-density houses) to the east. To the north is a low level one-storey factory. The development of 130 house here would ruin the special character and setting of the Cragg Wood Conservation Area.

This site is not effective. It only has one access point from and to the existing infrastructure (the A65). Developing it would only cause more problems for the ever-busy A65, meaning that this road will become even more unsustainable, congested and dangerous.

The site is not justified. It is a UK Biodiversity Action Plan (BAP) Priority Habitat, hosting wild deer, bats, fieldfare, lapwing, curlew, sparrow hawk, tawny owl. It also contains protected mature trees and woodland.

97% of the proposed housing in Rawdon will be on greenbelt land, and in Aireborough itself, a total of 69% of greenbelt land is proposed - this surely contravenes the NPPF guidelines. Aireborough has already had extensive development in recent years, it just cannot support any more. The council

have admitted that the infrastructure for the area will only be looked at after the building of the new houses has been completed – surely this is a ludicrous idea – the A65 through Aireborough and on into the city, for example, is virtually gridlocked by traffic most of the day. If the council had its way, a potential of 3000 extra cars would need to be using this route to get to the ring road or into Leeds city centre.

## **HG2-41 Rawdon Crematorium – Horsforth Roundabout**

The Council, in its suitability assessment, says that development of this site would cause only a 'marginal effect on the setting and special character'. This is wholly wrong – the site is vital in establishing the open countryside setting. It is a large and elevated position on the south-facing side of the Aire Valley, next to the Cragg Wood Conservation Area. The development of 777 houses and a school are totally inappropriate to the existing historical low-density, low scale housing, noted in the Cragg Wood Conservation Area Appraisal and Management Plan).

The council have admitted that the infrastructure for the area will only be looked at after the building of the new houses has been completed – surely this is a ludicrous idea – the A65 through Horsforth and on into the city, for example, is virtually gridlocked by traffic most of the day. If the council had its way, a potential of 3000 extra cars would need to be using this route to get to the ring road or into Leeds city centre.

Ancient Ghyll Beck runs through this site.

### **HG3-2 Knott Lane West**

This site has been made 'Protected Area of Search' (PAS) land, which again, I was not informed about. It should be returned back to greenbelt status, as presently, it can be put forward for development before 2028 if housing targets are not met. This land should not be built on. Ever.

Leeds Country Way runs through this site, which is a key regional recreational route.

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### **HG3-3 Knott Lane East**

This site has been made 'Protected Area of Search' (PAS) land, which again, I was not informed about. The family who also rent this piece of land for their chickens, geese, pigs and bees are also deeply shocked that the status of this land has been changed without their knowledge. It should be returned back to greenbelt status, as presently, it can be put forward for development before 2028 if housing targets are not met. This land should not be built on. Ever. This site also has a major gas pipe running through it, which has always meant that houses could not be built on it – so why is it PAS land?

Leeds Country Way runs through this site, which is a key regional recreational route.

This site is not effective. It has one access point from and to the existing infrastructure (the A65). Developing it would only cause more problems for the ever-busy A65, meaning that this road will become even more unsustainable, congested and dangerous.

This site is not justified. Wildlife habitats will be lost. This site is a UK Biodiversity Action Plan (BAP) Priority Habitat, hosting wild deer, bats, fieldfare, lapwing, curlew, sparrow hawk, tawny owl. It also contains protected mature trees and woodland. Ancient Ghyll Beck runs through this site, and also has a native bluebell wood.

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### HG3-4 Layton Lane

This site is not justified. It is a UK Biodiversity Action Plan (BAP) Priority Habitat, hosting wild deer, bats, fieldfare, lapwing, curlew, sparrow hawk, tawny owl. It also contains protected mature trees and woodland. Ancient Ghyll Beck also runs next to this site.

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I would also like to take part in the future public examination that will be held regarding this. Could you please contact me by letter or email.

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Yours faithfully

Kate McKeown