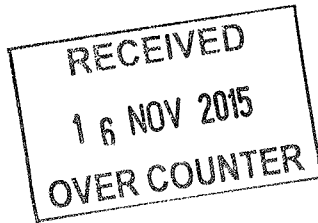


PDHO1573



Councillor Dawn Collins
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14/11/2015

LDF Publication Draft Consultation,
Forward Planning and Implementation,
The Leonardo Building,
2, Rossington Street
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Reference

HG2-41 Fields South of A65, Horsforth roundabout to the crematorium
HG2-42 Fields at Broadway and Calverley Lane, Horsforth
HG2-43 Fields at Horsforth College Campus
HG2-12 Fields at Woodlands Drive, Rawdon
HG3 - 2, HG3 - 3, HG3 - 4 Fields off A65, Rawdon

Dear Sir

I am writing with reference to the current Consultation regarding Leeds Site Allocation.

My response to your four key questions is as follows:

<i>Have the plans been positively prepared?</i>	NO*
<i>Are the plans justified?</i>	NO*
<i>Will the plans be effective?</i>	NO*
<i>Is the plan consistent with National Policy?</i>	NO*

*My answers are the same whether using either Leeds' definition of these questions or the full NPPF definition.

My reasons for my answers are as follows:

The Site Allocation Plan put forward by Leeds City Council primarily focuses on housing numbers with very little else taken into consideration. There is no detail about required infrastructure or amenity and how that infrastructure and amenity will be realised before development takes place.

Land that has been identified in the Core Strategy as Strategic Green Infrastructure (a document that has been reviewed and approved by an independent inspector) is now being listed for housing. This is not permitted.

Land that has been designated as Green Belt is being listed for housing without a Comprehensive Review as requested by the independent inspector during the review of the Core Strategy. This is not permitted.

These sites are adjacent to Conservation Areas already established and recently reviewed by Leeds City Council. Development of these sites would have a detrimental impact on these Conservation Areas.

Sites HG2-12 and HG2-41 are good quality agricultural land. This land is has been used for many years (and is still being used) for growing crops and for the grazing of cattle.

Site HG2-41 has become a well used public amenity and is an essential area of green space, used by many within the local communities. Many visit the site throughout the year to pick fresh vegetables and fruit from the cultivated fields. This promotes health and well being by improving people's diets and by providing essential exercise.

Leeds is currently failing in its (and the European) objectives to improve air quality and falls below the set standards *daily*. Development of these green fields will have a serious impact on the air quality of those living nearer the denser city centre as well as those people living near to the fields themselves. 'Pushing out' the green infrastructure within our city can only increase pollution concentrations near the centre even more.

There are two clearly identified communities close to these sites; Rawdon and Horsforth (each has its own Parish and Town Council). Developing any of the sites **HG2-12, HG3 - 2, HG3 - 3, HG3 - 4**, which are all adjacent to the parish boundaries, will lead to the two communities merging.

Sites **HG2-41, HG2-43, HG2-12** are new. No one within the city, including the local community, has had the opportunity to comment on these sites before. There has been no prior full consultation on them. They were not included on the SHLAA. They are now being presented as a fait accompli by the city council as it has been stated by the city that the 'plans are unlikely to change'.

The NPPF (para 83) states "Green Belt boundaries should only be altered in exceptional circumstances". Just endeavouring to meet housing number targets is not an exceptional circumstance.

The NPPF (section 17) states "Plans should be kept up-to-date". Leeds has not reviewed the target housing numbers even though it has been clear for many months now that the figures used in the SHMA are out of date and hugely inaccurate. It is not acceptable to just decide to wait for the next release of data before commencing on a re-evaluation.

Both Rawdon Parish Council and Horsforth Town Council are currently in the process of writing their own Neighbourhood Plans. They have been registered with Leeds as the approved body to write these plans for many months now. Leeds has

never approached or consulted with either of these Neighbourhood Plan steering groups to discuss any plans for their or the city's future.

Leeds City Council has had very little communication with Bradford City Council and has failed to communicate sufficiently with this neighbouring community. There is no detail about what cross-boundary impacts these Leeds sites will have on Bradford and no detail about what impact the development of Bradford sites, some which extend to within a few meters of the Leeds Boundary, will have on Leeds residents.

It is not clear whether the two cities proposals are compatible or whether the two cities are actually both trying to accommodate the same people.

There are many brownfield sites within the city that were listed in the SHLAA as suitable for housing, but have not been put forward. Contamination on a site is not a sufficient reason for rejecting a site. Government funds are available to assist in the cleaning of a site in order to make it viable. Brownfield sites must always be used before greenfield and Greenbelt sites. Greenfield sites must always be used before Greenbelt sites.

Yours sincerely
Dawn Collins

Councillor, Lee
Councillor, Horsforth Town Council
Councillor, Rawdon Parish Council
Resident of Rawdon