



Response to Leeds City Council's  
Site Allocations Plan  
Public Consultation  
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## **Aim of Rawdon Greenbelt Action Group**

Rawdon Greenbelt Action Group has one aim - to preserve and defend the special landscape character of Rawdon from further housing development or any other inappropriate development.

The Group promotes the policy that Leeds brownfield sites should be developed in order to prevent the need to build on greenbelt, in accordance with the government's National Planning Policy Framework. There are more than sufficient sites to do so.

Rawdon village has had more than its fair share of housing development over the last few years, and all brownfield sites are now taken with housing estates. Rawdon is challenged with retaining a village identity, sitting as it does between the two towns of Yeadon and Horsforth.

Rawdon Greenbelt Action Group (RGAG) has campaigned tirelessly to represent our whole community in the defence of its treasured greenbelt.

RGAG disagrees with the use of the following sites as detailed in the Leeds City Council (LCC) Site Allocations Plan (SAP):

## HG2-12

Woodlands Drive - **130 houses allocated**

## HG2-41

Rawdon Crematorium/Horsforth Roundabout - **777 houses & school/s allocated**

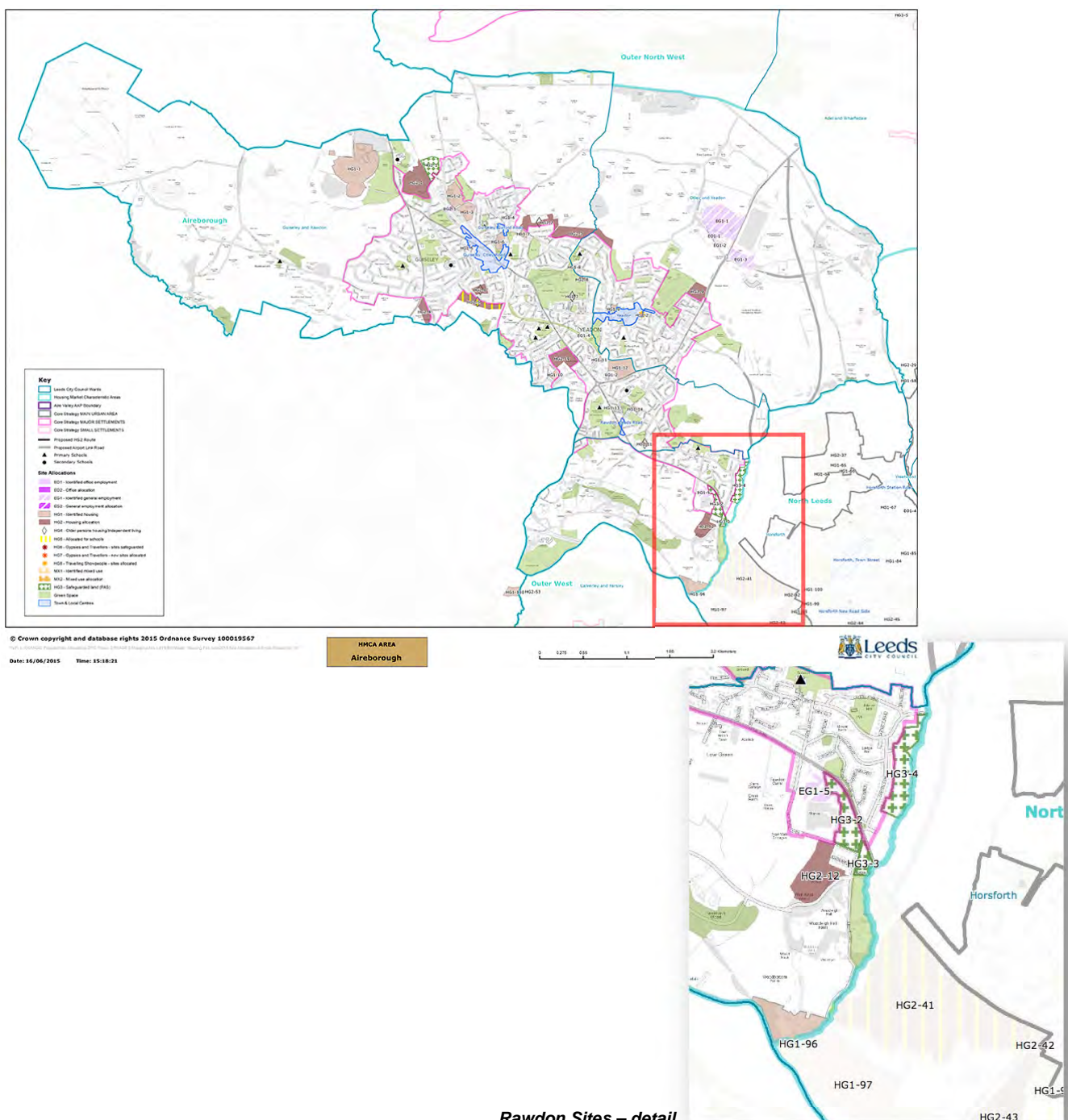
**HG3-2 - Knott Lane West – 81 houses**

**HG3-3 - Knott Lane East - 35 houses**

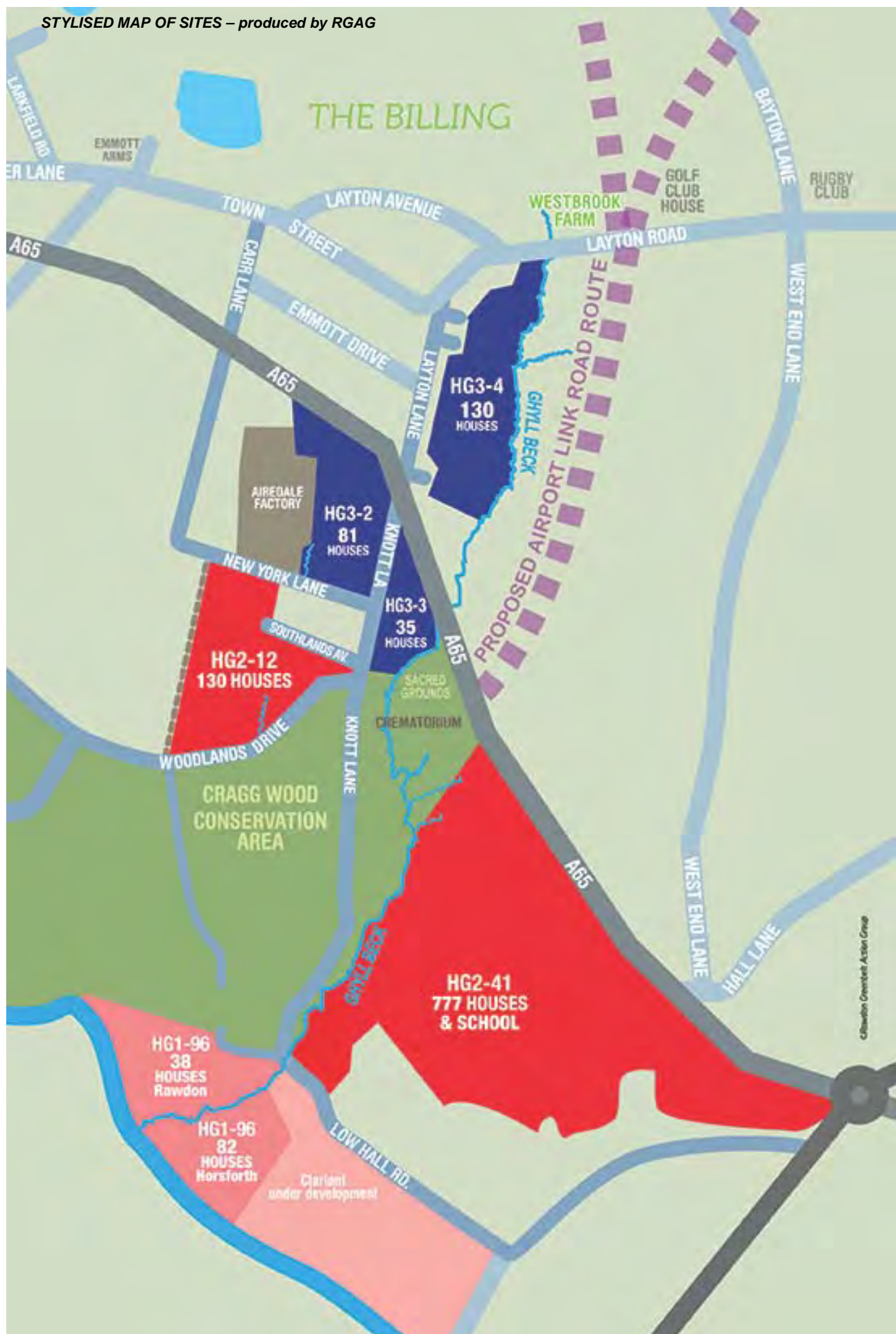
**HG3-4 - Layton Lane - 130 houses**

*'Safeguarded' land for 246 houses*

**Rawdon Village within Aireborough – Map of LCC Site Allocations Plan**









# Executive Summary

**The allocations are unsound on all four grounds because:**

## **Green Belt - chapter 1**

- Council has not carried out a comprehensive Green Belt review, as required under Core Strategy;
- The selective (*and flawed*) greenbelt review contains major flaws for Rawdon sites;
- Green Belt plays vital role in Rawdon and there are alternatives to building here

## **Conservation and Heritage - chapter 2**

- Area covered by sites is either within or adjacent to Cragg Wood Conservation Area and integral to its open countryside setting and views;
- Major development in this area would ruin Conservation Area and setting;
- The assessment of impact on the special character of the area is flawed and inadequate

## **Landscape and Character – chapter 3**

- Sites have particular visual impact within Special Landscape Area which should be conserved and enhanced, not built on;
- Flawed, inadequate and contradictory assessment of landscape value

## **Strategic Green Infrastructure Area - chapter 4**

- Sites all within strategic green infrastructure area of Aire valley, which is key area for recreation (walking, running, cycling and horse-riding), wildlife and carbon reduction
- Sites are on direct route of Leeds' only two country parks and Leeds Country Way
- Major development of sites would destroy this area and enjoyment for city visitors

## **Ecology and Biodiversity - chapter 5**

- This is a key wildlife corridor and biodiversity habitat supporting protected species
- Ancient Ghyll Beck runs alongside the sites, as well as ancient trees and bluebell woods

## **Highways and Transport - chapter 6**

- A65 is over-capacity, highly congested and cannot support more growth
- Proposed mitigation measures are inadequate and severely constrained
- Serious access issues to sites would make matters worse
- Concentrating more developments along A65 is unsustainable and dangerous

## **Not effective - chapter 7**

- physical constraints mean HG2-12 is not deliverable in plan period.
- contingent on safeguarded sites for access
- serious surface water flooding, gas pipeline and mineshafts mean development not viable



### **Lack of Consultation - chapter 8**

- inadequate consultation in the community is not consistent with SCI
- questions over Duty to Cooperate with Bradford
- no consultation on allocated sites in Rawdon / Horsforth border prior to allocation. Not included in *Issues and Options consultation* in 2013.

### **Sustainability – chapter 9**

- development would stretch services to breaking point, beyond sustainable levels

### **Potential alternatives have been overlooked:**

- Available brownfield sites are available across Leeds but have not been allocated.
- Other options have not been explored, such as smaller sites

**Council has not revised its housing target** in response to revised ONS projections which would mean city needs 45,000 and not current target of 70,000 - on which Council based its Core Strategy. A reduction in target of just 15,000 would remove need to take any land out of greenbelt. The NPPF is quite clear that housing targets must be based on up-to-date statistics.

**For all these reasons, Rawdon Greenbelt Action Group believes that Leeds City Council Site Allocations Plan is unjustified, not positively prepared, not legally compliant and not in line with national policy.**

**It is unsound.**



# Chapter 1

## GREEN BELT

### I. Why site allocation is unjustified

#### i. Background: Location and context

The land occupied by allocated sites HG2-12, HG2-41 and Safeguarded land HG3-2, HG3-3 and HG3-4 is all in **Green Belt** and forms part of the narrow green corridor which serves to separate Leeds and Bradford along the south-facing slopes of the Aire valley. The sites serve to separate the village of Rawdon in the north-west from the town of Horsforth to its south and east. They help to define the southern tip of Rawdon and preserve it as a distinct green village from the growing urban extension of Horsforth.

This is a very special and important area. The Green Belt serves a very important strategic function here to keep this green valley corridor open. This is recognised in its designation as **Strategic Green Infrastructure, Special Landscape Area and (Cragg Wood) Conservation Area**. These purposes are all dealt with individually in separate chapters, but their collective contribution to the purpose of the Green Belt here should be recognised.

Rawdon is the first settlement along the A65 towards Ilkley within the HMCA of Aireborough. It is an historic village, which is defined by its green wooded hillsides and open countryside, dotted by dry stone walls. It enjoys iconic long-distance views across the Aire valley to Calverley and Bradford to the west whose residents in turn enjoy long-distance views back towards Rawdon and the Cragg Wood Conservation Area on its southern slopes. All the sites are within this Special Landscape Area. Much of Rawdon's hillside is riddled with over and underground streams and becks, scattered with historic weavers' cottages, in clusters of lanes and folds.

Green Belt status was designed to protect villages like Rawdon. It is a semi-rural settlement, bordering open countryside, proud to be in the south Pennine foothills. The

Green Belt here is not scrubland or disused fields. It is Grade 3 agricultural land, with many ancient woods and hedgerows, scattered with hidden footpaths, enlivened with rambling becks and tiny springs. Many areas of Rawdon buzz with all kinds of wildlife and it's an important green corridor for migratory birds.

The openness of the countryside to the south and south west of Rawdon is very important not only in preserving the village's historic rural identity, but its Special Landscape, which is important to the whole city. It is even more important given its strategic location and the pressure on land here. Leeds does not have much countryside, particularly not so close to the outer suburbs of the city and therefore it is all the more cherished by its residents and visitors from Leeds, Bradford and beyond who particularly enjoy the Cragg Wood Conservation Area for walking, cycling, horse-riding and running.

The A65 is the main route from Leeds to Skipton, the 'gateway to the Yorkshire Dales'. Rawdon is the first settlement you reach on this route. As you leave the ring-road and travel up the A65, the land climbs and the panorama changes from enclosed buildings to open countryside and dramatic views over the Aire valley. It gives you a strong sense that you are leaving the city and going out to the Yorkshire Dales.

The residents of Rawdon understand this value – that's why they live here. When asked what they would retain and conserve about Rawdon (more than one response allowed), 95 per cent of residents said areas of green space and countryside, 81 per cent the village identity, 71 per cent distinctive/historic buildings and 66 per cent wildlife habitats (Survey by Rawdon Parish Council, August 2014).

There are no more brownfield sites in Rawdon. The village – once a thriving, if small, mill and quarry settlement (supplying stone for its own housing) – bowed out of the industrial revolution, as did its neighbouring Aireborough siblings. Former industrial sites have been replaced by housing over recent decades. The limited local infrastructure has been stretched to its limits as a result.

The land occupied by HG2-12, HG2-41 and the Safeguarded sites in Rawdon plays a pivotal role to the Green Belt purposes described above. The impact of development on the Green Belt in each of these sites is explained in detail below.



## ii. Effect on the Green Belt

As part of the site assessments for its Site Allocations Plan, the Council has carried out a Green Belt assessment of each of the Green Belt sites in the SHLAA in which it has assessed the impact of development in relation to the tests of Green Belt purpose defined in paragraph 80 of the NPPF, which are:

- *To check the unrestricted sprawl of large built up areas,*
- *To prevent neighbouring towns from merging,*
- *To assist in safeguarding the countryside from encroachment,*
- *To preserve the setting and special character of historic towns; and*
- *To assist in urban regeneration.'*

(Core Strategy SP10: Green Belt)

The Rawdon Green Belt Action Group has critically assessed the Council's Green Belt assessments and in the process produced its own alternative Green Belt assessments of each site. Please refer to the excel spreadsheet for more information. A commentary follows here:

### a. HG2-12

The allocation of HG2-12 to housing would have a major impact on the purposes of Green Belt. It is a highly important and prominent site within the special landscape of the Aire Valley corridor and the distinctive setting of the Cragg Wood conservation area, to which it makes a major contribution in terms of preserving openness. It also helps to preserve the open countryside around Rawdon village and to define its southern extremity. It plays a vital role in helping to maintain the green valley corridor between Leeds and Bradford through this part of the Aire Valley, which is a **strategic green infrastructure** area and special landscape area enjoyed by many thousands of people a year for recreation.

*Test 1: Check the unrestricted sprawl of large built up areas:*

*Would development result in an isolated development – Yes*

*Is the site well connected to the built up area: No*

*Would development round off the settlement: No*

*Is there a good existing barrier between the existing urban area and the undeveloped land:  
yes*

*Conclusion: high potential to lead to urban sprawl*

As the Council's Green Belt assessment shows, development would have a high potential for urban sprawl. It would result in an isolated, badly connected site, which would not relate well to the village. Its scale and position would cause it to jut out awkwardly, throwing the shape of the village out of kilter. The site has strong barriers between the existing urban area and the undeveloped land which, if breached by this development, would lead to high potential for very harmful urban sprawl through the open fields to the west of the site which form a key part of the open setting of the conservation area, towards Cragg Wood. Development, on its own or together with the precedent it would set, would ruin this special and much cherished area (see separate chapter on **conservation**).

*Test 2: merging of settlements:*

*Would development lead to physical connection of settlements? No*

*Do features provide boundaries to contain the settlement? Yes*

*Conclusion: No merging of settlements*

While the development would not lead to the physical connection of settlements, it would narrow the green corridor between Leeds and Bradford through the Aire Valley and set a precedent for development which would further threaten this gap.

No account has been made by the Council of the significant developments Bradford are proposing on the other side of the valley.

While boundaries are defined by a line of trees and an ancient dry-stone wall along its western side, we know from the removal of TPO protected trees along the boundary of New York Lane and HG3-2 (Airedale factory site), that this is no guarantee of a permanent boundary and these features can be removed by developers.

*Test 3: assist in safeguarding the countryside from encroachment:*

*Site performs an important role in safeguarding the countryside from encroachment.*



The assessment recognises the important role that the site makes in protecting the valuable countryside to the west and south which is a very prominent part of the setting of the conservation area and this very special landscape.

However the assessment makes a number of errors under this section which need correcting as a matter of principle:

*Does the site provide access to the countryside – No*

The answer should be **yes**. The Leeds Country Way runs along its entire western and northern boundary. It provides direct access to the countryside and conservation area via this path which provides access to Woodlands Drive, the main route through the conservation area. The field borders open fields to the west and conservation area woodland and countryside to the south with many public footpaths and bridleways through it. It is a **strategic green infrastructure** area.

*Areas of protected/ unprotected woodland / trees / hedgerows? – No*

The answer should be **yes**. The site includes High Knott Wood to the south-east, protected by TPOs. The site contains trees in a band within it. Mature trees line the southern and western boundary. Those on the southern boundary are protected within the conservation area and are ancient woodland. Hedgerow lines the western side.

*Site includes Grade 1, Grade 2 or Grade 3a agricultural land – No*

The answer should be **yes**. The site is Grade 3 agricultural land in regular farming use for livestock, crops and feed. The tenant farmer has been forced to relinquish his tenancy since 2014 pending a decision on housing allocation.

The assessment shows that the site currently fulfils two of the four tests of Green Belt purpose tested. We contend it fulfils a third too:

*Test 4: Preserve the setting and special character of historic towns:*

*Site within / adjacent to conservation area / listed building / historical features? Yes*

*Can development preserve this character? Yes*

Answer should be **no**.

*Character conclusion: Marginal effect on the setting and special character, could be mitigated against through appropriate detailed design.*

The site is located in a very sensitive and prominent position with relation to the setting of the Cragg Wood Conservation Area and plays a major role in preserving its open setting and special character. Development could not preserve this character, which is its openness and so therefore the conclusion should be, in line with the proforma:

**Development of the site would have a significant effect on the setting and special character of historic features.**

(For further information, please see **Conservation** chapter)

It is interesting to note that the Council's own assessment proforma (Appendix 2 of Green Belt Review Background paper) does not have an option for the 'marginal effect on the setting and special character' in the character conclusion - that word 'marginal' seems to have been added in to individual site assessments. This is important because the word 'marginal' plays down the significance of the effect on the setting and special character.

Given the significance of the site in contributing so highly to at least 2 of the 4 purposes of Green Belt tested (3 out of the 4 on our analysis), the overall conclusion of the Green Belt assessment does not accord with these findings:

*Overall conclusion against 5 purposes:*

*Green Belt site... Surrounded on three sides by development. Less sequentially preferable to other sites. Within conservation / special landscape area but site is not in prominent location or particularly visible within immediate area.*

This conclusion is manifestly wrong and flawed:

- 1) the site is not surrounded on three sides by development. There are open fields to the west. There is ancient woodland to the south, in conservation area. To the north, at a distance from the conservation area, there is a low-level, one-storey factory (Airedale) which has been sensitively re-designed (following a fire in 2014) to blend in to the landscape. To the north-east corner and occupying not more than a third of the length of the site, is a small housing estate (Southlands Avenue) which is not visible from the conservation area. To the east is woodland, in conservation area. Development occupies no more than 2 sides at most, and certainly does not 'surround' the site on these sides.



- 2) The site is in a very prominent location and very visible within the area and beyond it. It is the gateway to the Cragg Wood conservation area, in an elevated and highly prominent position in the Special Landscape Area of the south-facing slope of the Aire Valley. For the many visitors who use this area for recreation and exercise, it gives, in the immediate area, uninterrupted views from Woodlands Drive and all the fields / woodland / crematorium to its south, west and east which are all within the conservation area or its immediate setting. It is also plainly visible from New York Lane to the north. Outside the 'immediate area' it is visible from the south side of the valley at Calverley and the suburbs of Bradford, as part of the distinctive landscape of the Aire Valley.

The overall conclusion of the Green Belt conclusion should be to recognise the important contribution of the site to the Green Belt purposes, which should in turn be taken into account in the overall site assessment conclusion.

Yet the important phrase '*less sequentially preferable to other sites*' in the Green Belt conclusion has been entirely overlooked in the overall conclusion:

*'Green Belt site adjacent to residential development to the east despite being set away from the main urban area. The site is contained by woodland to the south and industry to the north.'*

The very selective conclusion ignores the high potential to lead to sprawl and encroachment and entirely overlooks the conclusion that the site is '*less sequentially preferable to other sites*'. If this is the case, why has it been allocated to housing? The surrounding Safeguarded sites are also described as *less sequentially preferable to other sites* and they have been Safeguarded. Why have these sites been Safeguarded, when HG2-12 has been allocated? Also, why have they been Safeguarded when they have a less important contribution to the purposes of Green Belt on the Council's own analysis?

The fact that such a contradictory overall conclusion has been drawn from the Green Belt conclusions shows that the Green Belt assessment is inaccurate and its relationship to the site allocation (and Site Allocations Plan), is flawed, inconsistent and unfair. The site allocation HG2-12 is therefore unjustified and unsound.

The conclusion should have been that the site allocation is overwhelmingly harmful to the Green Belt and outweighs the need for housing. The fact that it does not reach that conclusion raises serious question marks over the objective value of the Green Belt assessments as a whole.

The way Safeguarded land has been described and designated in the Core Strategy and the Site Allocations Plan also has a knock-on effect for HG2-12. It makes it more likely that Safeguarded sites around it will be used within the plan period, making it more likely a) that this site will be required and b) other sites around it will be needed to replace the Safeguarded sites as these are more likely to be located around recently developed Green Belt sites. This means that the potential for urban sprawl resulting from this site is higher. This has not been accounted for by the Council and it makes the plan unsound.

## **b. HG2-41**

Allocating housing to HG2-41 would have a major impact on the purposes of Green Belt. It is an extremely large (36 ha) site which contributes significantly to the openness of the countryside around Rawdon and Horsforth and to the open setting of the Cragg Wood conservation area. The site allocation proposes 777 houses and a primary and secondary school, or 900 without a school. The land occupied by the proposed site plays a major role in maintaining the gap between the Main Urban Area of Horsforth and the Main Urban Area of Rodley / Farsley / Bramley. The Green Belt assessment for HG2-41 contains errors:

*Test 1: Check the unrestricted sprawl of large built up areas:*

*Is there a good existing barrier between the existing urban area and the undeveloped land*  
– Yes

*Conclusion: low potential to lead to urban sprawl*

The Green Belt assessment proforma indicates that an answer of yes to the question above would lead to higher potential to lead to urban sprawl. The assessment fails to consider the extremely large nature of this site. The A65 provides a very strong existing barrier between the urban areas (outer edge of Horsforth) to the north east and south east but there are wide open fields to the north-west, west and south-west. The isolated ex-Clariant brownfield housing development to the south-western corner of the site and minor



roads to the north-west and south-west do not contain it. There is therefore a very high potential for the development to set a precedent for urban sprawl. Development on this 36 Ha Green Belt site would constitute significant urban sprawl of itself.

Development would permanently alter the shape and character of Horsforth. Although the site is well connected to the built up area, it does not relate well to the settlement form. Separated by the A65, the site is set apart from the main town centre by some distance and sits in a sort of no-mans land between Rawdon and Horsforth. Development would significantly harm the setting and rural character of the village of Rawdon. It would significantly alter the size and shape of Horsforth and distort it away from its main centre.

The conclusion therefore should be: **high potential to lead to urban sprawl**

*Test 2: merging of settlements:*

*Do features provide boundaries to contain the settlement – yes*

It is not clear that these boundaries would be strong enough to contain such a large site. This gap plays a major role in maintaining the gap between the Main Urban Area of Horsforth and the Main Urban Area conurbation of Rodley / Farsley / Bramley. The development would not lead of the merger of settlements of itself, but combined with the high potential for urban sprawl, it would significantly narrow that gap and alter the shape of Leeds.

Horsforth town borders Rawdon Village which would almost merge if this development were to proceed, bar only Rawdon Crematorium separating them. It would bring it right up to houses in Rawdon, such as Red Beck Cottages

*Conclusion: no merging of settlements.*

The conclusion should be: **Development of the site would not result in actual merging of settlements but would significantly reduce the Green Belt gap between settlements**

*Test 3: assist in safeguarding the countryside from encroachment:*

*Areas of protected / unprotected woodland / trees / hedgerows? No*

The answer should be **yes**. There is a significant tree belt that runs north-south along Barr Lane. The eastern portion contains a beck and valuable hedgerows with mature trees that should be retained and managed to retain ecological features. Good network of hedgerows and standard trees.

*Site includes Grade 1, Grade 2 or Grade 3a agricultural land? No*

Answer should be **yes**. Site contains 94 per cent Grade 3 agricultural land.

*Conclusion: the site performs an important role in safeguarding from encroachment*

*Test 4: To preserve the setting and special character of historic towns:*

*Site within / adjacent to conservation area / listed building / historical features? Yes*

*Can development preserve this character? Yes*

Answer should be **no**.

*Character conclusion: Marginal effect on the setting and special character, could be mitigated against through appropriate detailed design.*

Character conclusion should be: **Development of the site would have a significant effect on the setting and special character of historic features.**

This very large site contributes significantly to the open setting of the Cragg Wood conservation area and development could not preserve this character, which is its openness. For further information, please see **Conservation** chapter.

The conclusions of the Green Belt assessment are therefore incorrect on at least two scores – unrestricted sprawl and special character. The site therefore meets at least 3 of the 4 tests for high impact on Green Belt.

It is hard to see how a site of such scale, in such a sensitive area, could generate the following two-line conclusions:

*Overall conclusion from assessment:*

*A large green Belt site. However, the site is well contained by the Clariant site, roads and natural boundaries.*

*Overall site assessment conclusion:*

*Green Belt site. The site is well contained by roads, trees and other development reducing potential for further sprawl. Development will allow infrastructure improvements including highway improvements and the provision of a new school.*

The conclusions are, at best, selective. The site would, of itself, constitute urban sprawl. The site is not well contained at all, as can be clearly seen on the site map, with minor roads and other boundaries not providing enough of a defence against unrestricted sprawl and encroachment. Development of site HG2-41 would create a very large urban extension, severely encroaching on the precious open countryside of this part of the Aire Valley, reducing the gap in the vital green valley corridor between Horsforth and Rodley, take away the open views which help to make this area and Rawdon so distinctive and destroy the special open setting of the Cragg Wood Conservation Area. It would permanently alter the rural character of Rawdon (particularly combined with the other development planned to the south side of the village) and unbalance the town of Horsforth. The potential of this site to deliver infrastructure improvements may give a little clue as to the proposed inclusion and scale of the site, but does not outweigh, and should not be used to justify, the overwhelming harm that would be caused to the Green Belt by this manifestly inappropriate allocation.

The way Safeguarded land has been described and designated in the Core Strategy and the Site Allocations Plan also has a knock-on effect for HG2-41. It makes it more likely that Safeguarded sites will be used within the plan period, so other sites will be needed to replace the Safeguarded sites and these are more likely to be around recently developed Green Belt land sites. This also means that the potential for urban sprawl resulting from this site is higher as the risk of further areas around it being designated as Safeguarded is high. This has not been accounted for by the Council and it makes the plan unsound.

### **c. HG3-2**

HG3-2 contributes to the openness of Rawdon and the open setting of the Cragg Wood conservation area. The Green Belt assessment for HG3-2 contains errors:

*Test 1: Check the unrestricted sprawl of large built up areas:*

*Is there a good existing barrier between the existing urban area and the undeveloped land*

*– No*



Wrong – the answer should be **yes**. There are good barriers between the existing urban area and the undeveloped land - A65 provides barrier to east; Airedale factory provides barrier to west and via its access road, to north; New York Lane provides barrier to south - if breached this could (and would) lead to urban sprawl by facilitating access into, and thereby development of, HG2-12 and the fields beyond.

*Conclusion: low potential to lead to urban sprawl*

This should be: (particularly given Highways access comments for HG2-12): **high potential to lead to urban sprawl**.

*Test 2: merging of settlements:*

*Do features provide boundaries to contain the settlement – no*

For completeness this should be **yes**, although unlikely to affect conclusion that *development would not result in merging of settlements*.

*Test 3: assist in safeguarding the countryside from encroachment:*

*Strong defensible boundary between site and urban area: No*

Wrong-the answer should be **yes**. As above, there are good barriers between the existing urban area and the undeveloped land - A65 provides barrier to east; Airedale factory provides barrier to west and via its access road, to north; New York Lane provides barrier to south.

*Does the site provide access to the countryside: No*

Wrong – the answer should be **yes** – the site provides access to the countryside surrounding the Cragg Wood Conservation Area through the Leeds Country Way which runs along its south-eastern boundary with HG3-3 and all along its southern boundary with New York Lane. It is a **strategic green infrastructure** area.

*Areas of protected / unprotected woodland / trees / hedgerows? No*

Answer should be **yes**. Unprotected trees along western and northern boundary.

*Site includes Grade 1, Grade 2 or Grade 3a agricultural land? No*

Wrong – **yes**. Site does contain Grade 3 agricultural land.

*Conclusion: site does not perform an important role in safeguarding from encroachment.*

Wrong. Taking into account these changes and using Council's pro-forma as a guide, the conclusion should be:

**The site performs an important role in safeguarding the countryside from encroachment.**

*Test 4: To preserve the setting and special character of historic towns:*

*Site within / adjacent to conservation area / listed building / historical features? No*

Wrong – answer should be **yes**. Site is adjacent to Rawdon Cragg Wood Conservation Area on its eastern boundary and within the setting of the conservation area to its south.

The overall character conclusion should therefore be: **Development of the site would have an effect on the setting and special character of historic features, which could be mitigated against through appropriate detailed design.** (Re Historic England's comment, we have suggested our own conclusion, but it would depend on detailed expert assessment).

*Overall conclusion: The site is well contained by existing development and would not constitute sprawl if developed.*

The conclusions from the above do not support this conclusion as it has a **high potential to lead to urban sprawl**

Whilst on a map, it looks as though site HG3-2 is well-contained and would not lead to sprawl, infact development would breach its strong boundaries with the existing urban area and the comments of the Highways Agency that it would facilitate development of HG2-12 support the conclusion that it would lead to urban sprawl westwards. Collectively, in conjunction with sites HG2-41, HG2-12, HG3-3 and HG3-4, it would constitute major development which would lead to urban sprawl into the countryside and permanently alter the character of Rawdon. Because of the way the Green Belt assessment has been carried out through the site allocations plan, the collective impact of Green Belt releases or Safeguarded designations near to one another has not been assessed and this is another reason why the plan is unsound.

The way Safeguarded land has been described and designated in the Core Strategy and Site Allocations Plan makes it more likely that this site will be developed before 2028. On this basis allocation HG3-2 is unjustified. This also means that the potential for urban sprawl resulting from this site is higher as the risk of further areas around it being taken out of Green Belt and re-designated as Safeguarded to replace this area is high and this has not been accounted for by the Council, which makes the plan unsound.

**d) HG3-3:**

HG3-3 contributes to the openness of Rawdon and the conservation area which it is within. The Green Belt assessment for HG3-3 contains errors:

*Test 1: Check the unrestricted sprawl of large built up areas:*

*Is the site well connected to the built up area? Does it have two or more boundaries with the existing built –up area? No*

Answer to this should be **no**. It is only partially bordered by an existing small estate to the west, separated by a road.

*Is there a good existing barrier between the existing urban area and the undeveloped land – Yes*

*Conclusion: low potential to lead to urban sprawl*

The Green Belt assessment proforma suggests that answers above may suggest a higher potential for urban sprawl, therefore the conclusion should be:

**High potential to lead to urban sprawl.**

*Test 2: Would development lead to physical connection of settlements? Yes*

*Do features provide boundaries to contain the development? No*

*Coalescence conclusion: No merging of settlements*

The wrong boxes have clearly been ticked here! The answers should be: **no**, the development would not lead to physical connection of settlements and **yes**, features do provide boundaries to contain the development. While the correction of these errors does not change the conclusion, it is concerning that basic errors have been made in the Green Belt assessments and reached the Site Allocations Plan without correction. It indicates that



the review has not been carried out thoroughly. How many more mistakes are there in other Green Belt assessments?

Test 3. *Does the site provide access to the countryside? No*

The answer should be **yes**. The site provides access to the countryside via the Leeds Country Way to which it is partially adjacent. Access to the conservation area and open countryside via Knott Lane. It is a **strategic green infrastructure** area.

*Areas of protected / unprotected woodland / trees / hedgerows? No*

The answer should be **yes**. Site contains wooded Ghyll Beck corridor down the eastern side of the site and hedgerow part of the way along the eastern boundary. The beck and lowland mixed deciduous woodland are UK Biodiversity Action Plan Priority Habitats.

*Site includes Grade 1, Grade 2 or Grade 3a agricultural land? No*

The answer should be **yes**, site contains Grade 3 agricultural land.

*Encroachment conclusion: The site does not perform an important role in safeguarding the countryside from encroachment.*

The conclusion should be: The site performs an important role in safeguarding the countryside from encroachment.

Test 4. *Site within / adjacent to conservation area / listed building / historical features? No*

Wrong – the answer should be **yes** site is within Rawdon Cragg Wood Conservation Area and very close to Grade II listed Woodleigh Hall.

The overall character conclusion should therefore be: **Development of the site would have an effect on the setting and special character of historic features, which could be mitigated against through appropriate detailed design.** (Re Historic England's comment, we have suggested our own conclusion, but it would depend on detailed expert assessment)

*Overall conclusion: Green Belt site, but well contained and would not constitute sprawl if developed.*

Of itself, site HG3-3 is well-contained and would not lead to sprawl, but collectively, in conjunction with sites HG2-41, HG2-12, HG3-2 and HG3-4, it would constitute major development and would lead to urban sprawl and permanently alter the character of Rawdon. Because of the way the Green Belt assessment has been carried out through the site allocations plan, the collective impact of green Belt releases or Safeguarded designations near to one another has not been assessed and this is another reason why the plan is unsound.

The way Safeguarded land has been described and designated in the Core Strategy and Site Allocations Plan makes it more likely that this site will be developed before 2028. This means that allocation HG3-3 is unjustified. The risk of further areas around it being taken out of Green Belt and re-designated as Safeguarded to replace this area is high and this has not been accounted for by the Council, which makes the plan unsound.

#### **e. HG3-4**

HG3-4 contributes to the openness of Rawdon. The Green Belt assessment for HG3-4 contains some errors:

*Test 2: merging of settlements*

*Conclusion: no merging of settlements*

The conclusion should be: **Development of the site would not result in actual merging of the settlements but would significantly reduce the Green Belt gap between settlements.** Development would come right up to geographical boundary of Rawdon with Horsforth (Ghyll Beck). Options A / B for proposed Airport Link road would run parallel to the other side of Ghyll Beck, leaving no green gap.

*Test 3: assist in safeguarding the countryside from encroachment:*

*Does the site provide access to the countryside? No*

The answer should be **yes**. Provides direct access to countryside via public footpath along Ghyll Beck, and public footpath networked across cross-boundary fields. It is a **strategic green infrastructure** area.

*Areas of protected / unprotected woodland / trees / hedgerows? No*

Answer should be **yes**. The trees along the east of the site have TPO designation. Contains ancient trees, ancient hedgerows and natural unprotected bluebell wood.

*Site includes Grade 1, Grade 2 or Grade 3a agricultural land? No*

Answer should be **yes**. Site contains 60 per cent Grade 3 agricultural land.

*Encroachment conclusion: The site does not perform an important role in safeguarding the countryside from encroachment*

The conclusion should be: **The site performs an important role in safeguarding countryside from encroachment.** Development would come right up to Horsforth boundary (Ghyll Beck). Options A / B for proposed Airport Link road would run parallel to the other side of Ghyll Beck, leaving no green gap.

*Overall conclusion: Due to the enclosed nature of the site, development would have limited impact on the Green Belt. Development would round off the land to create a new GB boundary formed by Gill Beck which is a stronger GB boundary than existing. The existing area to the North west of the site boundary but within the GB would also need to be excluded from the GB, this forms part of the garden of the new property.*

In fact development would have an effect on the special landscape character and setting. Ghyll Beck is a beautiful, naturalised and highly valued asset to Rawdon and beyond. It provides idyllic open space access to the fields beyond which are frequented by the community.

Whilst due to the enclosed nature of the site development would have a limited impact on the Green Belt, collectively, in conjunction with sites HG2-41, HG2-12, HG3-3 and HG3-2, it would constitute major development which would lead to urban sprawl and permanently alter the character of Rawdon. Because of the way the Green Belt assessment has been carried out through the site allocations plan, the collective impact of green Belt releases or Safeguarded designations near to one another has not been assessed and this is another reason why the plan is unsound.

The way Safeguarded land has been described and designated in the Core Strategy and Site Allocations Plan makes it more likely that this field will be developed before 2028. This

means that allocation HG3-4 is unjustified. The risk of further areas around it being taken out of Green Belt and re-designated as Safeguarded to replace this area is high and this has not been accounted for by the Council, which makes the plan unsound.

### iii. **Green Belt assessments have not been used effectively to inform site allocation**

The analysis above shows that there are serious errors and flaws in the Green Belt assessments. This section looks at the way in which assessments have been used to inform decisions on site allocations and shows that they have not been used effectively, consistently or fairly.

Given its negative Green Belt assessment, why, in the overall site conclusion, has site **HG2-12** been **approved** for housing allocation? The conclusion makes no mention of the results of the Green Belt assessment, which concluded that the site was: *'less sequentially preferable to other sites'*.

*'Publication Draft Plan Allocation Conclusion: Allocated.*

*Green Belt site adjacent to residential development to the east despite being set away from the main urban area. The site is contained by woodland to the south and industry to the north.'*

When compared with HG3-2, HG3-3 and HG3-4, which show less impact on the Green Belt than HG2-12, why has HG2-12 been allocated while these other sites have been Safeguarded? The green Belt review cannot have played much part, if any, in the site allocation decisions.

The allocations of HG2-12 and HG2-41 to housing, despite their major impact on the Green Belt, calls into question the Council's Green Belt review, as well as the soundness of the individual site allocations.

It is not clear how the Green Belt assessments fit into the sustainability and site assessments for each site and help an officer or planning board to decide on the future of a site. How do the Green Belt assessments relate to other factors which have been used



to measure sites, such as comments from infrastructure providers, statutory consultees and community bodies (where consultation has taken place), sustainability assessments and other factors such as relationship to the settlement hierarchy?

Taking out those sites that have been 'sifted out' on grounds of flood risk and relationship to settlement hierarchy, the Site Assessment Plan gives no information on the order in which factors have been considered or the relative weight attached to each factor for the remaining sites. In the conclusions of the site assessments and the Site Allocation Plan as a whole, there is no explanation about how the site allocation decision has been reached or how sites have been compared. It is not clear what, if any, impact the Green Belt assessments have had on the decisions.

The Green Belt assessments have not been carried out a) accurately and b) effectively, to make meaningful decisions about the impact of allocation on the Green Belt on each site and comparisons between different Green Belt sites, in order to reach decisions about how sites are allocated. The site allocations HG2-12 and HG2-41 and the Safeguarded allocations HG3-3, HG3-2 and HG3-4 are therefore not justified and are unsound.

## **II. Not positively prepared and not compliant with NPPF**

### **i. Leeds Council's selective review of Green Belt is unsound**

The flaws in the Green Belt review demonstrated calls into question the validity of the Council's entire Green Belt review, and therefore the Site Allocations Plan as a whole.

The Leeds Plan, alongside other growth plans for the city, propose or have already secured, a very significant amount of Green Belt 'release'. They do not merely make small scale adjustments to the Green Belt boundary around settlements: they make major wholesale change including:

- removing 788.3 hectares of Green Belt for development of 14,396 houses, including 48 hectares in Aireborough;
- removing areas of 'residual' Green Belt land around housing allocations (unquantified);

- redesignating the large swathe of rural land in the outer North East corner of the district arbitrarily as Green Belt;
- removing 32.6 hectares of Green Belt land for the expansion of Leeds-Bradford Airport, without consultation;
- removing unquantified amounts of Green Belt land to accommodate an Airport link road between the A65 at Rawdon to the A628 at Yeadon (proposed) – this would be opposite the Knott Lane site allocations in Rawdon.

No doubt the Council had hoped to avoid the need for anything more than a selective release of Green Belt around settlements: *‘otherwise review of the Green Belt will not be considered to ensure that its general extent is maintained’* (SP10).

But the scale of change proposed to the Green Belt means that a comprehensive review is essential, a point which was recognised by the Inspector of the Core Strategy.

As we will show, Leeds Council has carried out a selective review of the Green Belt in Leeds, rather than a comprehensive review. The flaws in the Green Belt assessments for the individual sites in Rawdon show up the fallacy of that decision. The decision to undertake a selective review of the Green Belt is not justified compared with the more appropriate alternative of conducting a comprehensive review. Moreover, the selective Green Belt review is not positively prepared. On this basis, both the Core Strategy and the Site Allocations Plan are unsound.

The previous Inspector, in his examination, found the Core Strategy to be unsound on the basis that it proposed a selective review of the Green Belt. Recognising that a large amount of Green Belt land would need to be developed to meet the Council’s housing targets, he expressly required the Council modify its Core Strategy to include the requirement to carry out a comprehensive review of the Green Belt:

*‘...as submitted, the Core Strategy only commits the Council to a selective review. This may lead to pressure to release land in the review area when, having regard to the advice in paragraph 85 of the NPPF, there is more suitable land elsewhere. A comprehensive review is also more likely to ensure consistency with the spatial strategy and increase the likelihood that boundaries will not need to be reviewed again at the end of the plan period.’*  
(Core Strategy Inspector’s Report, Non-Technical Summary)

*'The Council's proposal to undertake a selective review of the Green Belt boundary is unsound. This strategy, which forms part of policy SP10, is not positively prepared as it will not meet objectively assessed development requirements, particularly in relation to the need to deliver sufficient housing over the plan period. Additionally, it is not justified as a selective review is not the most appropriate strategy when considered against the more suitable alternative of undertaking a full review of the Green Belt boundary. Finally, a selective review of the Green Belt boundary would not be effective or consistent with national policy as it would not ensure that an appropriate supply of housing land is provided in sustainable locations.'* (paras 1.11-1.12, Leeds City Council Core Strategy Examination Session 6 – Green Belt: <http://www.leeds.gov.uk/docs/S6-4%20DPP%20S6.pdf>)

In the examination and subsequent report, the Inspector set out his reasons why a comprehensive review is needed:

*'... it is imperative that the new development required should take place in the right locations so that sustainable development is achieved. Therefore in line with the NPPF and the CS, it is essential that all of the land is reviewed and assessed in order to identify the most sustainable locations. Third, given the quantum of land that needs to be allocated and the need to ensure that sufficient land is allocated at this stage of the plan process to avoid the need for Green Belt amendments during and beyond the plan period, it is critical that the entire Green Belt site is reviewed...it is fundamental that a comprehensive review of all Green Belt is carried out across the Authority and not a selective review.'* (Core Strategy Examination Session 6 – Green Belt para 1.9- 1.10)

## **ii. Not compliant with NPPF**

In his findings, the Inspector drew specific attention to paragraph 85 of the NPPF which gives guidance to local authorities on redefining Green Belt boundaries.

Paragraph 85 of the NPPF says:

*When defining boundaries, local planning authorities should:*

- *ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;*

- *not include land which it is unnecessary to keep permanently open;*
- *where necessary, identify in their plans areas of ‘Safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
- *make clear that the Safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of Safeguarded land should only be granted following a Local Plan review which proposes the development;*
- *satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and*
- *define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.*

The Inspector found that the Council had not followed this guidance in the preparation of the Core Strategy or the proposed Green Belt review:

*‘...parts (iv) and (v) of Spatial Policy 10 do not accord with the advice set out at paragraph 85 of the NPPF and therefore the policy does not provide guidance on the identification of the most appropriate sites to be allocated for development and furthermore the policy, or indeed the plan as a whole, does not provide any guidance what so ever on the development of the Safeguarded land.’ (para 2.1) and ‘...The proposed methodology for the Green Belt review does not accord with the NPPF, in particular paragraph 85.’ (para 2.9)*

The Inspector proposed the following amendments to the plan:

*‘...the wording of Policy SP10 needs to be amended to ensure that any review of the Green Belt boundary is full rather than selective. The policy also needs to be redrafted to align with the criteria contained within paragraph 85 of the NPPF and a separate Safeguarded policy should also be provided.’ (para 2.11)*

### **iii. Leeds Council has not modified Core Strategy or conducted comprehensive Green Belt review**



Leeds City Council has not complied with these requirements in its adopted Core Strategy or Site Allocations Plan because:

- a) Although it has removed references to a 'selective' review of the Green Belt in its Core Strategy SP10, it has not replaced it with the word full;
- b) It has not ensured that any review of the Green Belt boundary is full rather than selective. The methodology of the Council's Green Belt Review is set out in its Green Belt Background paper to the Site Allocations Plan and in the individual Green Belt assessments of sites. It is clear that the Green Belt review is limited to these site-specific assessments, the same process that the Council were following at Issues and Options stage in 2013, the methodology of which was found to be unsound:

*'The Green Belt review assessment forms part of the overall site assessment pro-forma used for assessing both housing and employment sites. The proforma, or site assessment, including the Green Belt review was presented and discussed at Development Plan Panel on 2 July 2012.'* (Green Belt Review Background Paper section 4: The Green Belt Assessment Used.)

It is clear from the Green Belt Background paper that the Council has not changed this methodology or conducted a new review to *'accord with or even acknowledge the advice for defining Green Belt boundaries set out in paragraph 85 of the NPPF'*, following the Inspector's report.

- c) It has not redrafted Core Strategy SP10 to align with the criteria contained within paragraph 85 of the NPPF on redefining Green Belt boundaries. Spatial Policy 10 of the Adopted Leeds Core Strategy is reproduced in Appendix 1 to the background paper. It can be seen that the adopted policy has not been modified to accord with the advice set out in paragraph 85 of the NPPF: it makes no reference to it, or the advice contained therein. Neither is there any reference to this advice in the Green Belt Background paper.

- d) It has not provided any guidance on the use of Safeguarded land in SP10 to accord with NPPF paragraph 85 or produced a separate policy on Safeguarded land. The wording of the section on Safeguarded land in the draft Core Strategy (paras 4.8.6 – 4.8.7) has not

been modified. Infact, it contains advice that is directly contrary to NPPF guidance (para 85). It says: *'[Safeguarded] land will provide one of the prime sources for housing allocations in the LDF;*' this does not mention the requirement for this development to be in the long-term, *'well beyond the plan period'* (NPPF paragraph 85). It goes on to say: *'Through the LDF a sufficient and realistic supply of Safeguarded land will be identified to provide contingency for growth, if the supply of housing and employment allocations proves to be insufficient in the latter stages of the plan period. New Safeguarded should account for at least 10% of the total land identified for housing.'* (Core Strategy 4.8.7)

The Council's stated use of Safeguarded land is in direct conflict with the statutory purpose of Safeguarded land as defined in the NPPF (para 85). The Council intends Safeguarded land to be used as a contingency to accommodate a 10 per cent margin over the allocations for the current plan period in case further land must be released within the current period. But this is not what Safeguarded land is intended to do. Its purpose as clearly defined in paragraph 85 of the NPPF is: *'to meet longer-term development needs stretching well beyond the plan period'*; and in so doing help to establish *'Green Belt boundaries [that] will not need to be altered at the end of the development plan period'*. The Core Strategy SP10 has not been modified or a *'separate Safeguarded policy'* (2.11) provided, as requested by the Inspector, which would provide guidance *'as to the identification of land for development as Safeguarded land,'* or *'the timing of when Safeguarded land should be released for development.'* (2.7)

Without this explicit guidance in the Core Strategy, it is likely that Safeguarded land will be brought forward for development earlier in the plan period (before 2028) to meet expected shortfalls and that therefore the Green Belt boundaries will need to be altered again at the end of the development plan period, if not before. This does not comply with NPPF para 85 which is intended to maintain the essential characteristic of permanence in the Green Belt. It should have been made explicit that *'Safeguarded land is not allocated for development at the present time [and that] planning permission for the permanent development of Safeguarded land should only be granted following a Local Plan review which proposes the development.'* (NPPF para 85).

The Green Belt Background paper of the SAP does not constitute a policy for Safeguarded land. While it makes reference to the purpose of Safeguarded land, saying that *'Core*

*Spatial Policy 10 identifies the need to create areas of Safeguarded land (called Protected Areas of Search in the previous UDP) to ensure the long-term endurance of the Green Belt and provide a reserve of potential sites for longer term development beyond the plan period (2028)', this is, in fact, not true. The Core Strategy makes absolutely no mention of 'longer term development' or the plan period.*

The failure of the Council to change the Core Strategy to accord with the Inspector's requirements means that both it and the Site Allocations Plan is unsound, and the three Safeguarded sites in Rawdon: HG3-2, HG3-3 and HG3-4 are also unsound because their identification and inclusion as Safeguarded land is not justified, not positively prepared and not compliant with national policy.

In conclusion, despite the Council's claims that: *'The Green Belt review has been comprehensive in that it has considered all sites submitted for consideration for allocation, that fall within the agreed scope of the plan, in accordance with the Core Strategy'* (para 1.2, *Green Belt background paper*), it is clear that this definition fails to satisfy the terms of the Inspector's requirements. The Green Belt review has not been comprehensive and the Core Strategy and Site Allocations Plan are therefore unsound.

**iv. What alternative form should the Green Belt Review take to make it sound?**

Whilst there is no statutory guidance on how a Green Belt Review should be undertaken, the methodology for recent major local plan reviews has been informed by the best practice of other local authorities – 'other reviews'. These are themselves guided by the principles of **Planning Policy Guidance 2: Green Belts** (PPG2). In determining whether or not Leeds Council's Green Belt review – 'the Leeds review' – is comprehensive and compliant with NPPF (paragraph 85), and in identifying an alternative approach that would fulfil the requirements for a comprehensive Green Belt review that would make the local plan sound, the Leeds review can be compared with these other reviews, which include:

1) West Midlands Joint Green Belt Review Study (2015):

[http://www.warwickdc.gov.uk/downloads/file/2926/report\\_-\\_joint\\_green\\_Belt\\_study\\_-\\_stage\\_1pdf](http://www.warwickdc.gov.uk/downloads/file/2926/report_-_joint_green_Belt_study_-_stage_1pdf)

2) Joint Green Belt Study, SSR Planning, on behalf of the authorities of Coventry City Council, Nuneaton and Bedworth Borough Council, Rugby Borough Council and Warwick District Council, January 2009

[http://www.coventry.gov.uk/downloads/download/682/evidence\\_base-joint\\_green\\_Belt\\_study\\_2009](http://www.coventry.gov.uk/downloads/download/682/evidence_base-joint_green_Belt_study_2009)

3) Bath & North Somerset Green Belt Review Stage 1 Report, Arup April 2013:  
[http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Evidence-Base/Environment/gbr\\_stage1\\_report.pdf](http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Evidence-Base/Environment/gbr_stage1_report.pdf)

4) Northumberland Green Belt Review Methodology of Local Plan Core Strategy (December 2014): [http://www.northumberland.gov.uk/WAMDocuments/B5ADE03C-31F6-45F6-84D6-46F1462DD109\\_1\\_0.pdf?nccredirect=1](http://www.northumberland.gov.uk/WAMDocuments/B5ADE03C-31F6-45F6-84D6-46F1462DD109_1_0.pdf?nccredirect=1)

5) Dacorum Borough Council, St Albans and Welwyn Garden City:  
[https://www.dacorum.gov.uk/docs/default-source/strategic-planning/green-belt-review\\_final-report-part1.pdf?sfvrsn=0](https://www.dacorum.gov.uk/docs/default-source/strategic-planning/green-belt-review_final-report-part1.pdf?sfvrsn=0)

6) Broxtowe Borough Council, Gedling Borough Council & Nottingham City Council Green Belt Review Background Paper, June 2013  
<http://www.nottinghamcity.gov.uk/CHttpHandler.ashx?id=43183&p=0>

7) Borough of Broxbourne Review of the Green Belt for the preparation of the LDF, Final Report March 2008, Scott Wilson,  
[https://www.broxbourne.gov.uk/sites/default/files/Documents/Planning\\_Policy/pp\\_SW\\_Green\\_Belt\\_review%282008%29.pdf](https://www.broxbourne.gov.uk/sites/default/files/Documents/Planning_Policy/pp_SW_Green_Belt_review%282008%29.pdf)

## Comparison of review scope

The other reviews are comprehensive in scope, assessing all the Green Belt land in the local authority area. In terms of what is meant by ‘comprehensive’, it seems acceptable to vary the scope of the study to focus on Green Belt areas located around settlements (in the interests of directing development towards sustainable locations). Some reviews therefore exclude Green Belt land which is nowhere near a settlement, perhaps nearer the outer boundary of the administrative area (unless it has settlements near it). It also seems acceptable to exclude certain areas at the outset with primary constraints on development such as those in flood zone 3b or within Sites of Special Scientific Interest (SSSIs) (some reviews screen these out at the outset, others screen them out after the Green Belt review.) Notwithstanding these small variations, in all cases the majority of Green Belt land

in the administrative area has been assessed, unlike in the Leeds review, where only a minority of selective sites have been assessed.

A number of these reviews, including the West Midlands Joint Review and the Coventry City Council, Nuneaton and Bedworth Borough Council, Rugby Borough Council and Warwick District Council joint review, have been carried out jointly, across adjacent local authorities in regions or counties which share areas of Green Belt. Clearly, given the shared interest in common Green Belt land across adjacent local authority boundaries which may serve a similar purpose, a joint, strategic review of the Green Belt across local authority boundaries is useful in order to direct development towards the most appropriate areas in the preparation of their respective local plans.

### **Duty to Cooperate and effective joint working**

Given its proximity to Bradford and the narrow area of Green Belt that separates Leeds from Bradford, together with the similar stages which the two cities' local plans have reached and the need that both cities have identified to release large amounts of Green Belt land for development, it would be preferable for Leeds Council to have undertaken a joint review of the Green Belt. The findings of the Inspector at Core Strategy stage and the requirement to undertake a comprehensive review provided an appropriate opportunity for Leeds to do this, which it did not pursue.

At the very least, given the large amount of proposed site allocations on Green Belt bordering Bradford in Aireborough, Outer West and Outer North West and similar pressure on the Green Belt from Bradford, it is imperative that Leeds fulfils its Duty to Cooperate on this issue so that *'the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities'* (NPPF paragraph 182), and to ensure that a consistent methodology is used in appraising the shared Green Belt. Otherwise Leeds' review of the Green Belt cannot be comprehensive or strategic. It is not clear how Leeds has fulfilled this Duty to Cooperate with Bradford and other local authorities on this issue. Rawdon Parish Council is aware of only one meeting between Leeds City Council and Bradford MBC and further clarification is sought to establish that the requirement for effective joint working between the principal authorities has been demonstrated.

### **Comparison of review approach: separate study v part of Site Allocations Plan**



The common approach in the other reviews is to separate them from the Site Allocations process and conduct them independently, often through the use of an independent planning consultancy. While the other reviews may be part of the evidence base that has been commissioned to inform the preparation of the local plan, they have not been carried out as part of the Site Allocations plan. This approach differs markedly from the Leeds review, which has been conducted as part of the Site Allocations plan, which is why it is selective.

Since these other reviews are separate from the Site Allocations Development Plan, they are able to examine all the Green Belt land to assess its relative, objective value; they do not simply assess the Green Belt land that is immediately available and deliverable for housing, as in the Leeds review.

By making the Green Belt review subject to the Site Allocations Plan and first 'sifting' out sites against criteria such as availability, constraints on development and relationship to the settlement hierarchy, before undertaking the Green Belt assessment, the practical result is that only a selective review has been carried out in Leeds on a small proportion of the total Green Belt land. How can a judgement be made about the relative value of a single piece of Green Belt, when its contribution to the whole area of Green Belt is not known? With such a limited scope, there is no possibility of establishing a city-wide benchmark and it is impossible to say whether the most appropriate sites in terms of Green Belt (ie those which contribute least to Green Belt purposes) have been proposed for development.

The Leeds review is linked to the Site Allocations Plan and is therefore hide-bound to the Core Strategy housing target, HMCA housing distribution target and the other outputs of SP6 and SP9, which means that there is already a presumption in favour of development on the sites identified. That presumption may well have introduced an element of bias into the assessment (we have already seen errors in the Green Belt assessments of the Rawdon sites). This becomes all the more problematic in the absence of an effective method for scoring and comparing sites with one another for Green Belt purposes, which means that the judgment on the role of a site's impact on the Green Belt in making the site allocation decision is an individual one made by individual officers.

## Comparison of review methodologies

It is useful to go through the steps in the methodologies of the other reviews, and compare them with that of the Leeds review. The other reviews:

- examine the history and role of the Green Belt in their area;
  - Leeds review does not do this
- divide land first into broad areas and second into smaller 'parcels of land' dependent on size, structure, form and characteristics:
  - Leeds review only assesses individual Green Belt sites that are immediately available and deliverable and relate favourably to the existing settlement pattern – in practice a selective area of Green Belt;
  - By not assessing and characterising larger 'parcels' of Green Belt land, the Council cannot establish a comprehensive understanding of the value of all of its Green Belt;
  - The Leeds review does not identify parcels of land with shared defensible boundaries, meaning that it is likely that boundary changes will not have permanence and will not endure beyond the end of the plan period;
  - The assessment is expedient rather than strategic – this short-term vision means that the redefined Green Belt is not likely to be permanent, which is the essential characteristic of the Green Belt (NPPF para 79)
- assess these parcels of land objectively against the five purposes of Green Belt in the NPPF with a scoring criteria to establish the extent to which each parcel serves the five purposes; identify parcels to be retained and parcels to be taken forward for further study.
  - with no analysis of the Green Belt land around individual sites - 'the parcel', or a sense of the shared contribution that adjacent 'parcels of land' make to the purposes of the total Green Belt, the boundary changes lack context and the Leeds selective review does not:
    - a) direct development towards the most appropriate areas (since this cannot be known);

- b) identify land which it is not necessary to keep permanently open, as required by paragraph 85 of the NPPF when redefining boundaries;
- c) enable an extent of the 'harm' to the Green Belt to be quantified and weighed against the 'exceptional circumstances' necessary for the release of Green Belt land;
- d) ensure that redefined boundaries will endure beyond the end of the plan period and decrease the likelihood of the boundaries needing to be reviewed before the end of the plan period;
- e) make it likely that the Green Belt review will identify enough land to meet longer-term objectives beyond the end of the plan period (protected areas of search)

While the Leeds review assesses individual Green Belt sites against the five purposes, it does not use a scoring system to compare sites as in, for example Coventry, which identified sites which fulfil three or fewer Green Belt purposes for further study. As a result of this, and the selective scope of the review, the Leeds review cannot establish a benchmark for the qualitative assessment of Green Belt land and therefore it cannot identify the land which contributes least to Green Belt purposes towards which development should be directed. Arguably the reason the Leeds review does not use a scoring system to sort land is because the scope of the review is not wide enough to enable it to exclude sites which are objectively most favourable to the Green Belt purposes.

The lack of an effective scoring system to compare sites means that decisions on individual allocations must rely on the subjective judgement of individual planning officers, which means that the review is not consistent or objective. It is not clear that all the sites allocated have even been visited by officers, unlike these other reviews.

- Assess Green Belt parcels against secondary criteria to measure secondary uses of Green Belt towards: providing opportunities for access to the open countryside for the urban population; providing opportunities for outdoor sport and outdoor recreation near urban areas; retaining attractive landscapes and enhancing landscapes near to where people live; improving damaged and derelict land around towns; securing nature conservation interest; and retaining land in agricultural, forestry and related uses. These should not, however, be confused with the five primary purposes of the Green Belt (PPG2).
- To the extent to which these secondary criteria are assessed in the Leeds review or site assessments, it is partial, selective and inadequate. For example: access to the countryside, local/national nature designations and agricultural use are measured under the 'safeguarding the countryside from encroachment' section but not assessed in their own right. Providing opportunities for outdoor sport and recreation is not measured anywhere in the site assessment – an important omission given the importance of **Strategic Green Infrastructure** in the Core Strategy and national policy. Landscapes are only measured insofar as their topography is defined and whether or not a site is in a Special Landscape Area (SLA) is recorded; but any assessment in the Green Belt assessments is not thorough and does not refer back to the SLA, leading to errors, eg HG2-12. A Landscape Value Study has not been carried out. Please see **Landscape and Character** chapter.
- To the extent to which it does refer to these factors, it is not thorough, or measured against objective criteria or indicators such as Green Infrastructure or Special Landscape Area and does not set out how these factors help to form an overall Green Belt conclusion or site allocation conclusion. Separate studies, eg a Landscape Value Study, have not been carried out strategically to provide objective measurement to allow meaningful comparison between sites;
- There is no evaluation of **Strategic Green Infrastructure** or the important role that this plays either as part of the Green Belt, or in its own right, in the Leeds review. Please see chapter on **Strategic Green Infrastructure**.

- analyse those parcels which score least well for suitability for development based on assessment of: environmental and physical constraints on development, relationship to urban settlement, existing or proposed development, land availability, landscape assessment and connectivity to the urban area. Using a scoring system, establish which parcels should be taken forward for site identification for development and to establish a hierarchy in which parcels should be considered;
- By establishing an order and hierarchy of factors to be considered in locating sites for sustainable development, these other reviews establish a framework for the systematic assessment of sites which can be used as a basis for site allocations. By contrast there is a lack of order and hierarchy in the Leeds plan and the factors have been considered the wrong way round, putting availability (or supply) first and making a review of the Green Belt subject to it. It is not clear how the different factors have been used to reach a decision on site allocation, or whether they have done so systematically or consistently.
- For example, is the Green Belt conclusion more or less important than the sustainability assessment, or environmental or physical constraints, or relationship to settlement hierarchy? In what order have the factors been considered, how are they compared with other sites and what are the deciding factors? Without clarity about how decisions have been reached, or comparative judgements made, there can be no confidence that development has been directed to the most appropriate, sustainable locations. It is clear that the Inspector of the Core Strategy shared these concerns:
- *'We also have concerns about how the Council have assessed all of the sites, in that I do not believe that the Council have had proper regard to the need to weigh in the balance the fact that a site lies within the Green Belt with the need to achieve sustainable development...this is a matter for the Allocations DPD to determine.'* (para 3.1)
- undertake more detailed analysis of the parcels through Core Strategy / ies, taking on board other issues such as localised criteria.



A comparison of the Leeds review with these other reviews shows that the Leeds review is selective rather than comprehensive, the practical consequence of which has been to direct development towards less appropriate locations (for the purposes of Green Belt) such as HG2-12 Woodlands Drive. These reviews do however provide a more appropriate alternative mechanism to achieve a comprehensive Green Belt Review, and thus make the plan sound.

In conclusion therefore, the Core Strategy, Site Allocations Plan, Safeguarded land and individual site allocations on Green Belt are **unsound** (as not positively prepared, not justified and not compliant with NPPF) until such time as a comprehensive Green Belt Review is carried out, separate from the Site Allocations Plan.

#### **v. Exceptional circumstances - NPPF**

The Government attaches great importance to Green Belts (NPPF para 79).

*‘Once established, Green Belt boundaries should only be altered in exceptional circumstances.’ (NPPF paragraph 83)*

*‘inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances...Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.’ (NPPF para 87)*

The Council’s aim in the Site Allocations Plan with regard to the Green Belt is to require the minimum change necessary to the Green Belt. However ‘minimum impact’ (‘Green Belt review background paper page 1) is not the same as ‘least harm’.

#### **Measuring harm**

By not carrying out a comprehensive Green Belt review, the Council cannot know the relative value of each piece of Green Belt land allocated to housing. Therefore it cannot know the extent of potential harm that would result to the Green Belt individually or collectively by such allocations or take steps to reduce that harm. *‘Very special circumstances will not exist unless the potential harm to the Green Belt...is clearly*

*outweighed by other considerations.*’ If the potential harm to the Green Belt is not fully known, how can it be weighed in the balance with other considerations to establish the very special circumstances required to justify changing the Green Belt boundaries? Therefore Green Belt boundary changes proposed in the Site Allocations Plan are not justified without a comprehensive Green Belt review.

## **Establishing exceptional circumstances**

The Council considers *‘the Core Strategy targets to constitute the exceptional circumstance for the Green Belt to be reviewed.’* (Green Belt background paper, 2.1)

This contradicts the statement made to parliament in a parliamentary debate on the issue by Minister for Housing and Planning Brandon Lewis that unmet housing demand cannot by itself justify the exceptional circumstances necessary to redefine the Green Belt boundaries or outweigh the harm that would be caused by inappropriate Green Belt allocations:

*‘Most types of new buildings are inappropriate for Green Belt land and are, by definition, harmful to it. Such developments should not be approved except in special circumstances... However, our planning guidance makes it clear that unmet housing need, including need for Traveller sites, is unlikely to outweigh harm to the green Belt’* (3 February 2015)

This followed his written statement to Parliament, as Local Government Minister, on 1 July 2013 when he said: *‘The Secretary of State wishes to make clear that, in considering planning applications, although each case will depend on its facts, ‘he considers that the single issue of unmet demand, whether for traveller sites or for conventional housing, is unlikely to outweigh harm to the green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the green Belt.’* (2013)

Local MPs Stuart Andrew (MP for Pudsey) and neighbouring MP Greg Mulholland (MP for Leeds North) have been tireless in their fight against Green Belt development in this area. The Housing Minister’s February 2015 statement was made in the context of a Commons debate initiated by Mr Andrew MP for Pudsey (which includes Rawdon). See

Hansard:<http://www.publications.parliament.uk/pa/cm201415/cmhansrd/cm150203/halltext/150203h0002.htm>

They have argued, among many others, that the housing targets in the Core Strategy are based on out-of-date growth projections from the 2008 ONS census data. Figures from the 2011 census and figures based on aspirational housing targets identified by government would imply a much lower target (of around 44,000 homes). The continued pursuit of the 70,000 target despite newer data demonstrates that the Council has not taken reasonable steps to justify the exceptional circumstances necessary to redefine the Green Belt boundaries to this extent.

Since the out-of-date and unrealistically high housing targets are one reason why inappropriate allocations are being proposed on Green Belt, it is necessary for the Inspector to satisfy himself that the targets for housing growth in the Core Strategy still stand in the light of NPPF guidance at 158-159 that *'each local authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area'*. He also needs to satisfy himself that the Council has taken all reasonable steps to find alternatives to avoid the need to release land in Green Belt before establishing the exceptional circumstances necessary to release land in the Green Belt.

**vi. Potential alternatives:**

**i. Brownfield sites**

The Core Strategy makes it very clear that brownfield land should be utilised first before any land is released for development in the Green Belt:

CS 4.1.4: *'The delivery of the strategy will entail the use of brownfield and greenfield land and in exceptional circumstances (which cannot be met elsewhere), the selective use of Green Belt land, where this offers the most sustainable option'*.

Rawdon Parish Council has identified 157 potential brownfield / mixed use sites in the SHLAA, with a potential identified housing capacity of 24,700 homes, which have not been allocated for housing (please see Rawdon Parish Council's separate response submission):

- 94 brownfield sites identified as 'suitable' in the SHLAA have been excluded from the site allocation;
- No account has been taken of the Government's £1 billion fund set up to remediate brownfield sites and bring them into use ahead of Greenfield. This would allow the use of some of the sites which have been excluded on the grounds of contamination;
- Some brownfield sites that score far more positively in the SHLAA site assessments are not allocated whereas sites that score worse are allocated. There seems little consistency, as with the site assessments and allocation decisions for Green Belt sites;
- The site allocation plan releases the land in three phases. Large amounts of Greenfield are included in phase one. It is clear from the policies in the Core Strategy (SP6) that all available brownfield should be used first, in order to cause '*the least impact on Green Belt purpose*'. Clearly there will be a preference for highly profitable Green Belt land by developers, but this is not the same as meeting objective housing need and therefore this land must be Safeguarded by not being included until all available brownfield land has been used first. Please refer to RPC submission for detailed analysis of brownfield / greenfield phased release.

## ii. Unused homes

There are also a large number of unused houses and other buildings in the city centre that should be brought back into use or regenerated before Green Belt is considered for release: see 'Leeds Empties': [www.thersa.org](http://www.thersa.org)

## iii. Minimum threshold for SHLAA sites

The Council has also departed from national guidance in conducting a SHLAA which only assesses sites of a minimum of 0.4 ha, instead of the lower threshold of minimum 5 houses recommended in national policy guidance. The Council has not justified this course of action:

*‘One of the changes to the national guidance introduced by the NPPG was the expectation for SHLAAs to include sites as small as 5 dwellings (Methodology Stage I). Leeds’ previous SHLAA used the following size threshold: 0.4ha with the exception of sites with planning permission (down to 0.2ha) and sites in the city centre (any size). Even with this approach, Leeds’ SHLAA had more than 1000 sites identified. It is considered that to lower the threshold down to 5 dwellings would make Leeds’ SHLAA unmanageable. The sheer scale of Leeds and the number of sites involved provides good reason to depart from this aspect of national guidance. It should be noted that the NPPG also states: “Plan makers should have regard to the guidance in preparing their assessments. Where they depart from the guidance, plan makers will have to set out reasons for doing so.”’*

The Council’s justification for conducting a limited SHLAA is that even with this higher threshold, the SHLAA 2011 had more than enough sites identified. In its ‘Issues and Options’ consultation materials for Aireborough in 2013, the Council said:

*‘The Council has done initial assessments of the options for new housing and this shows that there may be enough sites to accommodate 2,293 homes, more than the number of new homes that are needed locally (1,548). This means that there is local choice on which sites are the best.’ (Your City Your Say, Site Allocations Plan Consultation June / July 2013)*

#### **iv. Other potential Green Belt sites with less harm?**

This begs the obvious question: if there was a surplus potential supply of 745 houses in Aireborough in 2013, why did the Council subsequently need to allocate site HG2-12 (Woodlands Drive) to housing, which was not in the Issues and Options consultation? Why were those sites identified for 745 houses dismissed? Given the very high impact of HG2-12 on the Green Belt and the major flaws we have identified in the selective Green Belt review, questions do need to be asked about why these other sites, which were deemed suitable enough to include in the Issues and Options consultation, were taken out of consideration subsequently, and whether there are other potential available sites in Aireborough which are less harmful to the Green Belt than HG2-12. This, and the lack of logic in the HG2-12 allocation (it cannot actually be delivered in the plan period – see **not**



**effective** section) is further evidence that the Council's Site Allocations Plan has not been objective, thorough, strategically managed or sound. Is it possible that HG2-12 (and HG2-41 in North Leeds HMCA) were included at the last minute, to make up the numbers? Why were they parachuted in in 2015 after the public consultation, how have they been compared to other sites considered at Issues and Options and, if one of the reasons why other sites were not allocated was public objection, how is it fair or justified to include HG2-12 which has not undergone any public consultation?

#### **v. Joint working with Bradford**

Given the proximity of Bradford, which borders Aireborough and Rawdon, and the similar stage that Bradford is at with its local plan, there is a potential for strategic joint working to identify whether there is potential surplus of supply in North East Bradford or other parts of Bradford that may be able to accommodate some of the housing share for Aireborough, should its housing target prove unsustainable or undeliverable in the HMCA.

Planning Minister Nick Boles is actively encouraging local authorities to have conversations with their neighbours about how housing need can be satisfied elsewhere in the region when Green Belt land provides a vital split between urban areas.

The Localism Act 2011 places a duty on neighbouring local authorities to engage constructively in the strategic preparation of local development plans or documents regarding sustainable development which would affect their respective local areas significantly.

It is not clear how Leeds City Council has fulfilled its Duty to Cooperate in this area and whether it has explored opportunities to satisfy housing need across borders.

#### **vii. Conclusion**

These alternative options potentially provide some more appropriate alternatives to the Green Belt site allocations in Rawdon.

### **Overall conclusions and recommendations**

## i. Green Belt review is selective and unsound

There is an inevitable tension that arises from the Council's decision to conduct the Green Belt Review through the Site Allocations Plan. The Site Allocations Plan must adhere to the policies of the Core Strategy, which sets ambitious (arguably unrealistic) targets for housing and employment growth. The Inspector recognised that the housing in Spatial Policy 7 was supply-led in that the indicative scale and distribution of growth it identifies is informed by the availability of land (the SHMA and SHLAA) rather than need, and as a result, in his words, *'put the cart before the horse.'*

The purpose of the Site Allocations Plan has therefore been primarily to accommodate the scale of housing and employment development embodied in the Core Strategy and *'a contingency for growth, if the supply of allocations proves to be insufficient in the latter stages of the plan period, equivalent to at least 10 per cent of the total land identified for housing.'* (Core Strategy 4.8.7)

This is not the same purpose as a Green Belt review, which is to *'consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.'* (NPPF paragraph 83). That requires need not only in the current development plan period but well beyond it to be considered.

The Council intends the Safeguarded land to provide a contingency to accommodate a 10 per cent margin for housing allocation within the plan period, contrary to the statutory purpose of Safeguarded land in NPPF 85 which is to *'meet longer-term development needs stretching well beyond the plan period.'* This important difference means that the redefined Green Belt boundary is not likely to be permanent and makes a further and probably more extensive review highly likely at the time of the next Core Strategy and / or SAP review.

We have demonstrated that the individual site allocations in Rawdon, and the Safeguarded allocations, are flawed. The Green Belt assessments are full of errors and have not been used effectively to draw meaningful conclusions from them. As a result, they are unsound.

As long as the Green Belt review is subject to the Site Allocations Plan, it cannot be other than selective in scope, it cannot ensure that 'least harm' will be done to the Green Belt and it cannot be sound.

As a matter of principle, there is nothing to prevent the Green Belt review and decisions on site allocations from being separated. As shown, there are plenty of examples of comprehensive Green Belt reviews whose purpose is to assess the contribution of Green Belt land to inform site allocations made subsequently at a district level. Many local development frameworks have been designed in a similar fashion, with the question of Green Belt boundaries dealt with at Core Strategy level and site allocations in later development plan documents.

## **ii. Need to demonstrate exceptional circumstances**

The Council needs to review its housing growth targets to take into account up-to-date figures before deciding the extent to which the Green Belt boundaries need to be altered. This review needs to take into account need not only in this plan period (2028) but well beyond it, in order to ensure that boundaries will not need to be changed again at the end of the plan period (NPPF 85).

## **iii. Need to pursue more appropriate alternatives**

In order to satisfy itself that it has caused '*least harm to the Green Belt*' (SP6) and to ensure the existence of exceptional circumstances for releasing Green Belt that would outweigh the harm, the Council needs to take all reasonable steps to ensure it has pursued all possible alternatives to redefining the Green Belt boundary, which include (but are not limited to): development of all suitable brownfield sites in advance of Green Belt release; bringing back empty homes into use; considering smaller sites with threshold under 0.4 Ha; joint working with Bradford to a) conduct a comprehensive Green Belt review and b) identify how unmet need could potentially be met in Bradford.

There is a tension identified between the policy to prioritise brownfield land release before Green Belt land (and cause least harm on the Green Belt) in SP6 on the one hand, and the indicative housing distribution in SP7 and the site allocations planned for Aireborough HMCA (including Rawdon) on the other. This is because most available brownfield sites are located elsewhere in the city, with very few remaining in Aireborough. Given that the Core Strategy makes clear that the indicative distribution percentages in SP7 should be used as a guide, rather than a rigid target, it would be open to the Inspector, given

evidence of a large number of available brownfield sites elsewhere, to amend the scope of the Site Allocations Plan and Core Strategy to accommodate this.

#### **iv. Recommendations**

- The current Site Allocations Plan must be found unsound
- The Green Belt Review must be separated from the Site Allocations Plan. The scope of the Local Development Framework must be amended to ensure this. The Green Belt Review should inform the Site Allocations Plan, not vice versa.
- The policy on Safeguarded land must be amended to make it clear that it is not intended for development within the plan period
- A new Green Belt Review must be commissioned that is comprehensive in scope and preferably carried out jointly with Bradford MBC (and other relevant local authorities). The analysis of 'other green Belt reviews' set out in section iv of this document provides a blueprint for the potential form such a review should take. The review should take into account not just need in this plan period but well beyond the end of the plan period (2028). It should take into account secondary purposes of Green Belt, not just primary (while recognising that primary take precedence). The Council should ensure that any potential changes to the Green Belt boundaries resulting from this review are consulted upon.
- To ensure that 'least harm' is done to the Green Belt overall and that 'exceptional circumstances' for redefining Green Belt boundaries are proven, the Council must:
  - - a) take all reasonable steps to find alternative brownfield sites elsewhere, particularly that all brownfield sites capable of delivery are allocated before releasing any Green Belt sites (in accordance with Core Strategy policy SP1), by conducting a city-wide review of available brownfield sites
    - b) change the indicative housing distribution figures specified in SP7 or to into account this brownfield release and ensure that all brownfield sites are developed before any Green Belt release
    - c) review its housing growth targets to take into account up-to-date census figures before deciding the extent to which the Green Belt boundaries need

to be altered. This review needs to take into account need not only in this plan period (2028) but well beyond it, in order to ensure that boundaries will not need to be changed again at the end of the plan period (NPPF 85).

- d) prioritise a policy to bring back empty homes into use
- e) consider a SHLAA and Call for Sites for smaller sites with threshold under 0.4 Ha
- f) jointly work with Bradford to identify how unmet need could potentially be met in Bradford.



## Chapter 2

# CONSERVATION AND HERITAGE / HISTORIC CHARACTER

- 20th century residential development around Acacia Park Drive, Acacia Park Crescent, Acacia Park Terrace and Fairway is of comparably smaller grain but reflects the ethos of the area as detached houses in relatively sizable plots.
- Open agricultural land surrounding the conservation area adds to the spacious and picturesque character of the area.

1872 map showing the system of original carriage drives that structure today's layout of the area. The settlement form is dominated by large detached properties set in spacious grounds.

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### Background: The Cragg Wood Conservation Area

The Cragg Wood Conservation Area is an historic area of mid-late Victorian villas set in spacious wooded grounds in the steeply wooded slopes of the Aire valley side. The settlement form is dominated by the mansions set within their spacious landscaped grounds and the planned carriage drives (principal among them being Woodlands Drive)

that wind across the contours of the valley. Villas were typically built by prosperous Bradford woollen merchants and feature high levels of architectural ornamentation and high quality local gritstone. The ancient woodland, tree lined avenues, surviving elements of the landscaped grounds, in particular the boundary belts and mature trees, form a dominant element of the special character. The wooded area of Rawdon Cragg Wood sits on the south-facing side of the valley surrounded by open agricultural fields.

Allocated housing sites **HG2-12** and **HG2-41** are adjacent to and in the immediate setting of, the conservation area and safeguarded site **HG3-3** is within it. Safeguarded sites **HG3-2** and **HG3-4** are nearby. The development of sites **HG2-12**, **HG2-41** and **HG3-3** would have a major adverse impact on the conservation area.

Conservation areas are areas of special architectural or historic interest.

Designation makes sure that change is managed so that the special character of the area and its setting is preserved or enhanced. The Cragg Wood Conservation Area is protected through the [Rawdon Cragg Wood Conservation Area Appraisal and Management Plan \(2012\)](#), which means that it is a material consideration in the determination of planning decisions.

Conservation areas do not exist in isolation but are enhanced by their setting. The special position of the conservation area on the steep slopes of the Aire Valley means that it derives particular character and value from its landscape setting, and in turn defines this important landscape, which is also a **Strategic Green Infrastructure Area** and **Special Landscape Area**. It forms a vital part of the narrow **greenbelt** corridor separating Leeds and Bradford through the Aire valley. It is within the **West Leeds Country Park** and forms the setting of the **Leeds Country Way** and is highly valued by the residents of the area and visitors from further afield.

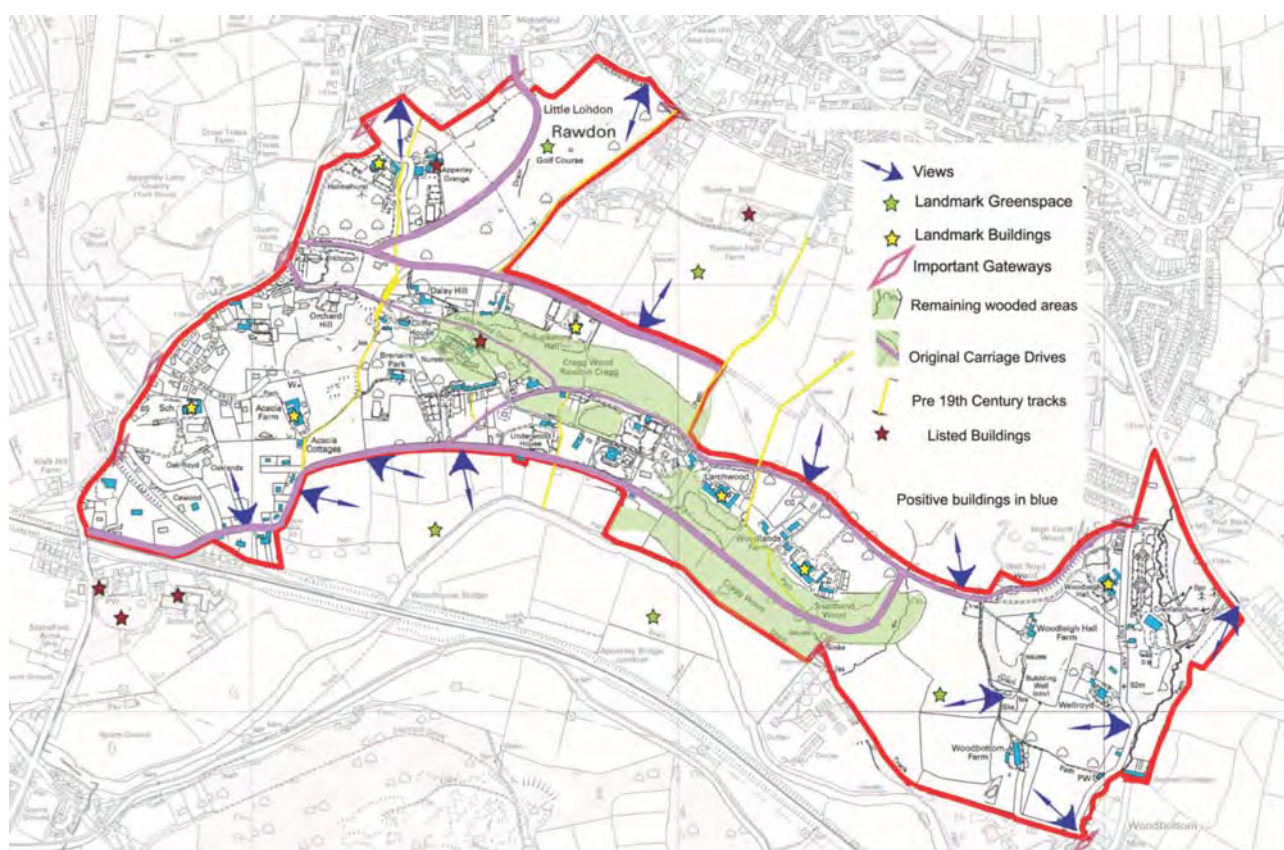


## Why site allocation is unjustified.

### I. Background:

#### 1 Location and importance to conservation area

**Site HG2-12** sits adjacent to the Cragg Wood Conservation Area and within its immediate setting.



It performs a key role as the gateway to the Cragg Wood conservation area, at the junction between Knott Lane and open fields, in a prominent, elevated position on the south-facing slope of the valley visible from the original carriage drive Woodlands Drive (which it borders) and the fields / woodland to its south which are within the conservation area, the crematorium to its east which is within the conservation area and the open fields to its west which are within the immediate setting of the conservation area. It is therefore fundamental to the setting of the conservation area. It is also visible all along New York Lane to the north and from the other side of the valley in Calverley, Greengates, Eccleshill and Thackley.

**Site HG2-41** sits adjacent to the Cragg Wood Conservation Area and within its immediate setting.

It is a very large site (36.3 hectares) that helps to establish the setting of the Cragg Wood conservation area in open agricultural fields on the south-facing slope of the Aire valley. It is visible from Knott Lane and the crematorium to the north / north-west, both of which are within the Cragg Wood conservation area. It is also visible all along the A65 from the ring-road north, which is the gateway to the Yorkshire Dales, and from the other side of the valley in Calverley, Apperley Bridge etc. It is also adjacent to the Horsforth conservation area to the north.

## 2. Importance of conservation area setting

The [Rawdon Cragg Wood Conservation Area Appraisal and Management Plan](#) protects not just the area within the boundary of the conservation area but also its setting, which is of particular importance to the special character of the Cragg Wood Conservation Area. The plan sets out the specific characteristic of 'openness' in the setting that helps to define the Cragg Wood conservation area and set it apart from other conservation areas:

*pg 2: 'long distance open views to the countryside, River Aire and beyond is indicative of its rural character that distinguishes it from other 19<sup>th</sup> century villa developments usually found on the edge of towns.'*

*Pg 4: 'The predominantly wooded area of Rawdon Cragg Wood sits on the south-facing side of the valley surrounded by open agricultural fields.'*

*pg 9: 'Open agricultural land surrounding the conservation area adds to the spacious and picturesque character of the area.'*

*Pg 13: 'Open countryside surrounds Cragg Wood providing picturesque views.'*

Views include those both from and towards the conservation area and the Spatial Character Analysis map clearly defines the open views over site **HG2-12** and **HG2-41** and its surrounding fields (pg 8) that are protected:





The entry-point to the east of the land occupying site **HG2-12** on Knott Lane is marked as an 'Important Gateway' to the conservation area.

The far western corner of site **HG2-41** is marked as an 'Important Gateway' to the conservation area.

The map also shows the proximity of the sites to the Grade II listed building Woodleigh Hall.

In the document, detailed chapters and maps again and again emphasise the importance of the wider setting of the conservation area (Location and context: geology, topography and landscape setting, Settlement form, Key views and landmarks and Spatial analysis).

### 3. Protection of conservation area setting

The management plan then sets out the protection afforded to the setting. Under the title 'Setting of the conservation area', it states:



*'It is important that development around the conservation area does not spoil its setting. Views towards and away from a conservation area can be spoilt by inappropriately placed buildings or groups of buildings, at key locations. Appropriate design and materials should still be used when considering development adjacent to the conservation area, as well as consideration given to the impact it may have on views towards and away from the conservation area.'*

*'Action: Ensure that the setting of the conservation area is considered as a material consideration within the planning process' (pp 2 and 15)*

There is also a requirement in the Planning (Listed Buildings and Conservation Areas) Act 1990 that 'special regard' should be had to the desirability of preserving Listed Buildings or their setting or any features of special architectural or historic interest which they possess.

#### **4. Conclusion: Why the housing allocation is unjustified**

##### **HG2-12:**

Clearly, the Council's proposed high-density, isolated development of 130 houses would destroy the open landscape and long-distance views which are a key part of the character of the Cragg Wood conservation area, contrary to the appraisal and management plan which protects this setting. This development would therefore be inappropriate and unjustified.

The Council has also made a series of errors and failures of judgment with regard to the conservation area in its sustainability assessment, as given in the greenbelt assessment section of its site assessment (section 4):

*'4. Preserve the setting and special character of historic towns*

*Site within/adjacent to conservation area/listed building/historical features? **Yes***

*Can development preserve this character? **Yes***

*Character conclusion: **Marginal effect on the setting and special character, could be mitigated against through appropriate detailed design***

*Overall conclusion from assessment against all 4 purposes of green belt and essential characteristics of openness and permanence*

***Greenbelt site. Adjacent to residential development and industry to the north. Surrounded on three sides by development. Less sequentially preferable to other sites. Within conservation / special landscape area but site is not in prominent location or particularly visible within immediate area.***

- 1) The Council says that HG2-12 is '*surrounded on three sides by development*' - it is not. There is **no development to west or south** and only **partial** (carefully screened low-density houses (Southlands Avenue and New York Lane) **to the east**. (To the north is the low-level one-storey Airedale factory).
- 2) The Council says that '*site [HG2-12] is not in prominent location or particularly visible within immediate area.*' It asserts that development would cause only a '*marginal effect on the setting and special character*'.

This is manifestly wrong – the site is the gateway to the Cragg Wood conservation area, in a highly prominent and elevated position on the south-facing slope of the Aire Valley. It is the first in a line of open agricultural fields creating a stretch of open, unspoilt countryside from Knott Lane to Cragg Wood. It creates a parkland style setting around the conservation area and uninterrupted views from Woodlands Drive (an original carriage drive and main route through the area) and all the fields / woodland / crematorium to its south, west and east which are all within the conservation area or its immediate setting. It is also plainly visible from New York Lane to the north and from the south side of the valley at Calverley, Greengates, Eccleshill and Thackley. The development of a housing estate of some 130 houses would totally ruin the special character and setting of the conservation area, since it would take away this characteristic of 'openness' in the setting which is so important to the conservation area. The development would also harm the setting of the Grade II listed building Woodleigh Hall, which is a building of particular architectural merit in very close proximity to HG2-12.

- 3) The Council's conclusion that development could preserve the character of the conservation area and that adverse effects could '*be mitigated against through appropriate detailed design*' is not true and misleading. Given the strategic location of the site and its importance to the open setting and views which are intrinsic to the Cragg Wood Conservation Area, there is no development in this location that could

preserve or enhance this overriding characteristic of 'openness'; the two are mutually exclusive. The development of a housing estate of 130 houses in this position, in open and undeveloped fields, would obscure the view and stop the countryside from being 'open'. Therefore appropriate design could not by itself mitigate against the considerable harm that this development would cause to the conservation area.

- 4) Purely in design terms, the conclusions are wrong. The proposal clearly does not meet the criteria for 'appropriate detailed design'.

*'New buildings need to respond to their setting in terms of... architectural design – e.g. scale, form, quality of materials and building methods. (Cragg Wood Conservation Area Appraisal and Management Plan pg 14)*

*Successful new development in historic areas will: Relate well to the geography and history of the place and the lie of the land; Sit happily in the pattern of existing development; Respect important views; Respect the scale of neighbouring buildings; Use materials and building methods which are as high in quality as those used in existing buildings; Create new views and juxtapositions which add to the variety and texture of their setting. (Cabe and English Heritage, 2001, 'Building in Context: New development in historic areas', as quoted in Cragg Wood Conservation Area Appraisal and Management Plan pg 14)*

The proposed development of 130 houses in 4.75 hectares is clearly totally inappropriate in form, scale and density to the historically low scale, low-density housing of the Cragg Wood conservation area and its setting where: *'the settlement form is dominated by large detached properties set in spacious grounds [of 2 - 5 acres]. Properties are set well back from the road and mainly hidden from view.'* (Cragg Wood Conservation Area Appraisal and Management Plan p.9).

It also fails to respect the landscaped setting of the Grade II listed building Woodleigh Hall. As set out above, because of the impact on the open setting, the proposed development would not 'relate well to the geography and history of the place and the lie of the land', 'respect important views', 'respect the scale of neighbouring buildings' nor 'sit happily in the pattern of existing development'.

Instead it would form an 'isolated' housing estate, as the greenbelt assessment admits (see Greenbelt assessment section 2).

## HG2-41

Clearly, the Council's proposed development of 777 houses and a primary and secondary school on site **HG2-41** would destroy the open landscape and long-distance views which are a key part of the character of the Cragg Wood conservation area, contrary to the appraisal and management plan which protects this setting. This development would therefore be inappropriate and unjustified.

The Council has also made errors and failed in its judgment with regard to the conservation area in its sustainability assessment, as given in the greenbelt assessment section of its site assessment (section 4):

*'4. Preserve the setting and special character of historic towns*

*Site within/adjacent to conservation area/listed building/historical features? **Yes***

*Can development preserve this character? **Yes***

*Character conclusion: **Marginal effect on the setting and special character, could be mitigated against through appropriate detailed design***

*Overall conclusion from assessment against all 4 purposes of green belt and essential characteristics of openness and permanence*

***A large greenbelt site. However, the site is well-contained by the Clariant site, roads and natural boundaries.***

5) The Council asserts that development would cause only a '*marginal effect on the setting and special character*'.

This is blatantly wrong – the site provides a vital role in establishing the open countryside setting of the conservation area. A very large site, it occupies a prominent and elevated position on the south-facing slope of the Aire Valley. It creates a large stretch of open, unspoilt countryside from the ring-road to the south-side of the conservation area, Knott Lane and the crematorium. It offers views from and towards the conservation area. Clearly a development of a high-density

housing estate of some 777 houses plus a school would totally ruin the special character and setting of the conservation area, since it would take away the crucial characteristic of 'openness' in the setting which is so important to the conservation area. The development would also harm the setting of the Grade II listed building Woodleigh Hall to its north.

- 6) The Council's conclusion that development could preserve the character of the conservation area and that adverse effects could *'be mitigated against through appropriate detailed design'* is not true and misleading. Given the strategic location of the site and its importance to the open setting and views which are intrinsic to the Cragg Wood Conservation Area, there is no development in this location that could preserve or enhance this overriding characteristic of 'openness'; the two are mutually exclusive. The development of a housing estate of 777 houses plus a school in this position, in open and undeveloped fields, would obscure the views from and towards the conservation area and stop the countryside from being 'open'. Therefore appropriate design could not by itself mitigate against the considerable harm that this development would cause to the conservation area.
- 7) Purely in design terms, the conclusions are wrong. The proposal clearly does not meet the criteria for 'appropriate detailed design'.

*'New buildings need to respond to their setting in terms of... architectural design – e.g. scale, form, quality of materials and building methods. (Cragg Wood Conservation Area Appraisal and Management Plan pg 14)*

*Successful new development in historic areas will: Relate well to the geography and history of the place and the lie of the land; Sit happily in the pattern of existing development; Respect important views; Respect the scale of neighbouring buildings; Use materials and building methods which are as high in quality as those used in existing buildings; Create new views and juxtapositions which add to the variety and texture of their setting. (Cabe and English Heritage, 2001, 'Building in Context: New development in historic areas', as quoted in Cragg Wood Conservation Area Appraisal and Management Plan pg 14)*

The proposed development of 777 houses and a school in 36 hectares is clearly totally inappropriate in form, scale and density to the historically low scale, low-density housing of the Cragg Wood conservation area and its setting where: *'the settlement form is dominated by large detached properties set in spacious grounds [of 2 - 5 acres]. Properties are set well back from the road and mainly hidden from view.'* (Cragg Wood Conservation Area Appraisal and Management Plan p.9).

It also fails to respect the landscaped setting of the Grade II listed building Woodleigh Hall and other landmark buildings. As set out above, because of the impact on the open setting, the proposed development would not 'relate well to the geography and history of the place and the lie of the land', 'respect important views', 'respect the scale of neighbouring buildings' nor 'sit happily in the pattern of existing development'.

## II. Not positively prepared

The Council's Core Strategy says that:

*'The historic environment, consisting of archaeological remains, historic buildings, townscapes and landscapes, including locally undesignated assets and their settings, will be conserved.'*

*'Development proposals will be expected to demonstrate a full understanding of historic assets affected.'* (Policy P11: Conservation)

The site allocations of **HG2-12** and **HG2-41** would result in development which would harm, rather than conserve, the historic environment. The errors and failure of judgment in the sustainability (site) assessments with regard to the preservation of the setting and special character of the conservation area and the listed building shows a lack of understanding of the historic assets affected. Therefore the site allocations are not positively prepared.

Historic England makes clear in other site assessments (such as Gill Lane Yeadon) that before allocating an area close to an historic asset (including a conservation area or listed building), there needs to be some assessment of what contribution the currently undeveloped area makes to the significance of the building or area and what effect its loss and subsequent development might have upon the significance of these assets. If



allocated, development proposals would need to ensure that those elements which contribute to their significance, including their setting, are not likely to be harmed. Given the late inclusion of site **HG2-12** into the Site Allocation Plan after Issues and Options stage (see **legal compliance** section), it is not clear that the Council has undertaken this assessment or consulted with Historic England, whose comments are absent from the site assessment. Comments from Heritage England are also missing from the site assessment of **HG2-41**.

### III. Not compliant with National Planning Policy Framework (NPPF)

The National Planning Policy Framework (NPPF) says:

*'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. (para 132)*

The NPPF makes clear that the significance of a heritage asset such as a conservation area or listed building can be harmed or lost through alteration or destruction of the heritage asset or development within its setting and that great weight should be given to conserving the asset. In allocating sites **HG2-12** and **HG2-41** to housing, the Council has failed to conserve the Cragg Wood Conservation Area and the Grade II listed building Woodleigh Hall by allocating inappropriate development within its setting. It has failed to provide the 'clear and convincing justification' required for its harm or loss.

*'Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss...'* (para 133)

Substantial harm or loss of the significance of the conservation area and listed building is not necessary to achieve substantial public benefits, since a) the harm or loss outweighs the stated need for housing b) there are other locations where housing could be supplied with less harm to the area.

In measuring the harm that would be caused, attention should be given to the value placed on it by residents. In a survey of Rawdon residents by Rawdon Parish Council as part of preparatory work for a Neighbourhood Plan, areas of green spaces and countryside were the areas that respondents were most likely to want to conserve (92 per cent), followed by the village identity, distinctive/historic buildings (72 per cent). Most of the respondents felt that Rawdon's conservation areas should be strengthened and expanded (80 per cent). This shows that the conservation area is a key asset of the village, highly valued by residents and it would not be in the public interest to harm it. Additionally, Cragg Wood conservation area is enjoyed by thousands of walkers, hikers, runners, cyclists and horse-riders from well beyond the village, so its significant public benefit goes well beyond the HMCA. The loss of this asset would cause substantial harm which would not be outweighed by the stated need for housing.

## Chapter 3

# LANDSCAPE AND CHARACTER

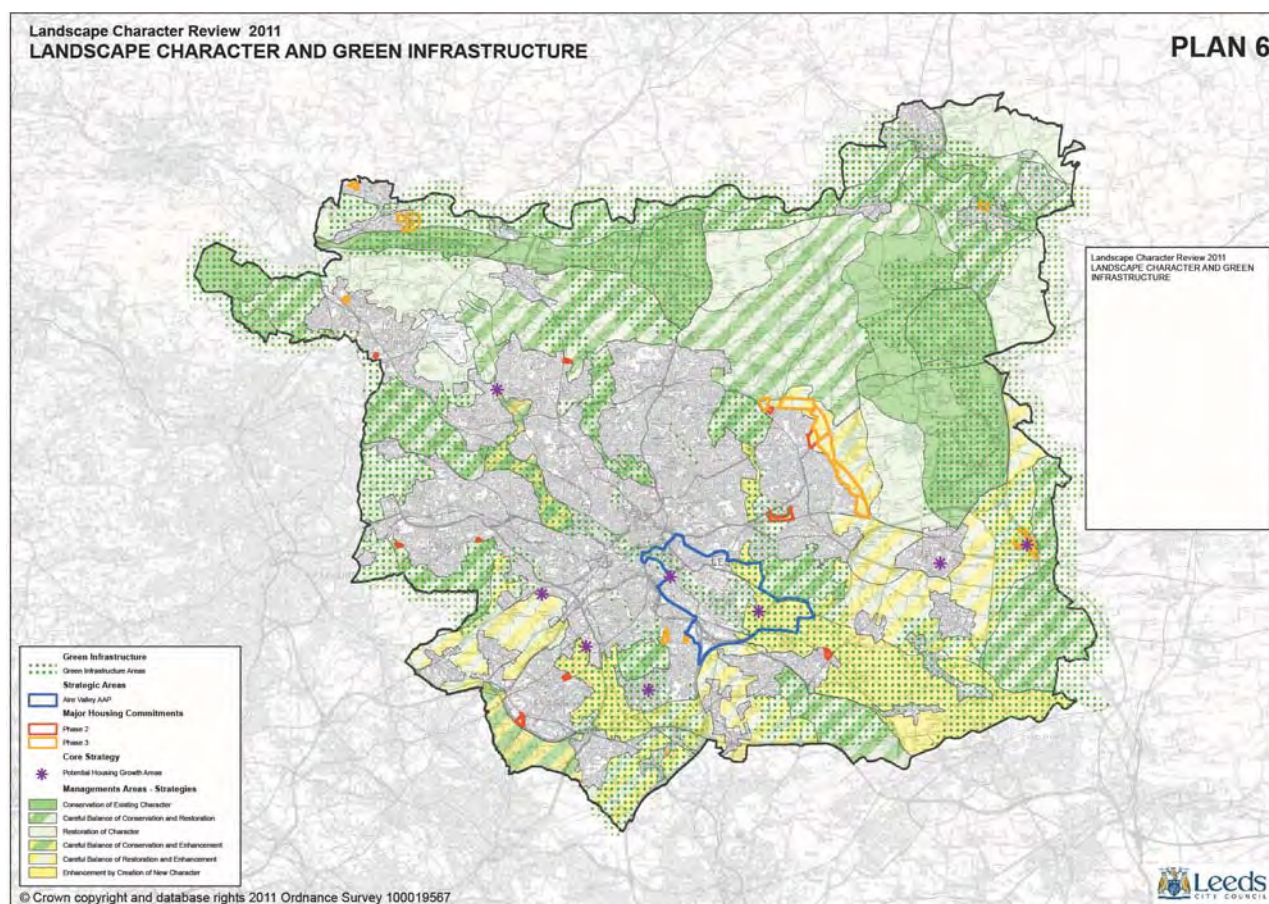


**Rawdon from Calverley**

### **I. Importance of landscape**

The landscape of the area occupied by sites HG2-12, HG2-41, HG3-2, HG3-3 and HG3-4 is extremely important to the character of the city of Leeds.

The Leeds Landscape Character Review 2011 designates this area as a Special Landscape Area within the Calverley River Valley of LCM18 (Leeds Coal Measures): <http://www.leeds.gov.uk/docs/1%20Parts%201-3%20reduced.pdf> All the sites are within this designation.



As you can see from the map, the quantum of land included in the SLA network is not large within Aireborough and certainly not this close to the city centre.

This landscape is historically important, in the way that the wood (Cragg Wood) and topography of the valley has shaped the development of distinctive Victorian villas in large landscaped grounds linked to the Bradford woollen industry (see Conservation and Heritage chapter). The landscape is strategically important, as recognised in its Green Infrastructure status (see chapter), for the opportunities it provides for visitors and residents of surrounding urban areas to enjoy the fresh air, recreation and outdoor space in this special environment, for the wildlife, flora and fauna that finds a home in its green corridor and for the impact that the trees make on reducing Leeds' carbon footprint. And it is geographically important, to the shape and character of Leeds and Bradford, and on a local level, the distinctiveness of historic settlements Rawdon and Horsforth.

LCM18 Calverley Valley is described as: *'an intact and distinctive river valley...Woodland is prominent on the steeper valley slopes, providing an important recreational and visual*



*resource and surrounding pockets of intact pasture. These tend to be bordered by drystone walls or a strong pattern of hedgerows.'*

In the wider context, the landscape is set within National Character Area Profile 38: Nottinghamshire, Derbyshire and Yorkshire Coalfield (Natural England): insert reference. The area profile recognises the national importance of historical features and river valley green corridors:

*'This NCA is an important area nationally for history, especially in relation to industrialisation and the story of its impact on the landscape. Opportunities should be taken to maintain and restore historical features in the landscape and to explore how they can be interpreted and used to educate and engage people with the landscape.'*

*'Rivers and waterways are an important feature in the landscape, often linking rural and urban areas and increasingly providing green corridors and tranquil settings for both people and wildlife.'*



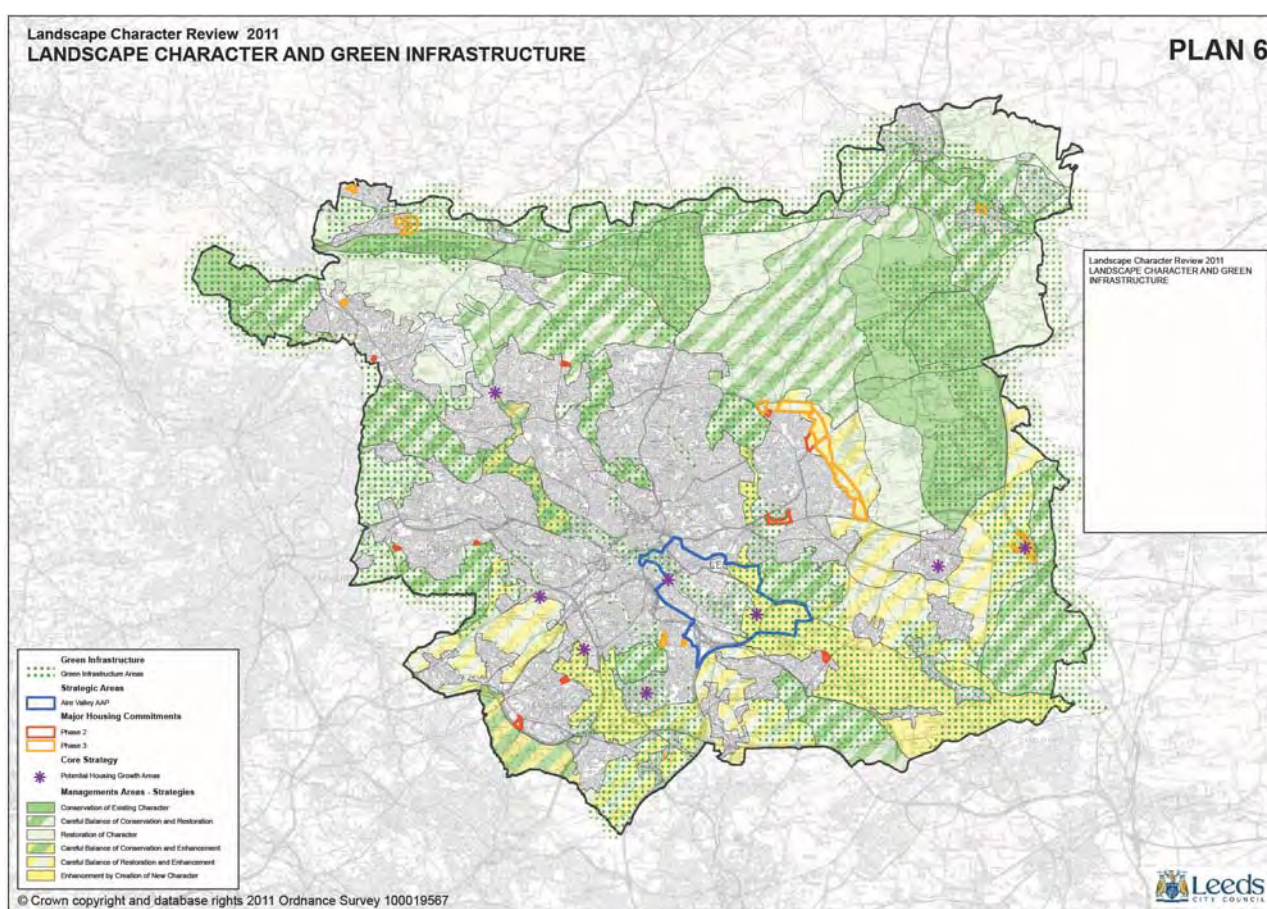
© darren sanderson photography

**HG3-3 –**

**Ghyll Beck tunnel  
– Roe Deer use  
this to pass from  
Cragg Wood to  
Layton Lane fields  
– HG3-4**

## II. Conservation and restoration

As a nationally, regionally and locally distinctive and highly important landscape, the Leeds management strategy reflects this. Plan 6 of the Landscape Character Review 2011 shows that this is an area with a Management Plan of 'careful conservation and restoration':



The Leeds Landscape Character Review says:

*'The overall management strategy for the river valley landscape type should be careful balance between conservation of the intact, rural pastoral and wooded features of the river valley, combined with restoration where these features are in decline or where urban influences are beginning to encroach.'*



The following relevant management guidelines apply:

- Conserve areas of permanent pasture;
- Conserve and enhance tree cover through regeneration and replanting of field boundary trees;
- Where opportunities exist, consider restoring areas of former parkland;
- Conserve and strengthen the characteristic pattern of small and medium sized fields.



The National Character Area Profile 38 additionally identifies four 'statements of environmental opportunity':

- 1) Restore and enhance existing areas and create new landscapes through the inclusion of woodland and networks of green infrastructure to raise the overall quality of design and location of new developments

- 2) Protect and manage the archaeological and historical environment to safeguard a strong sense of cultural identity and heritage, and use the area's distinctive sense of place to inspire interpretation and new development.
- 3) Conserve, enhance and expand areas and corridors of semi-natural habitat such as grasslands and woodlands to create a functioning ecological network that links fragmented patches of habitat through urban and sustainably farmed environments
- 4) Manage, enhance and extend wetland habitats associated with the rivers Aire etc

This is clearly a landscape that should be conserved and enhanced, rather than destroyed and eroded by development.



The Core Strategy also makes this clear:

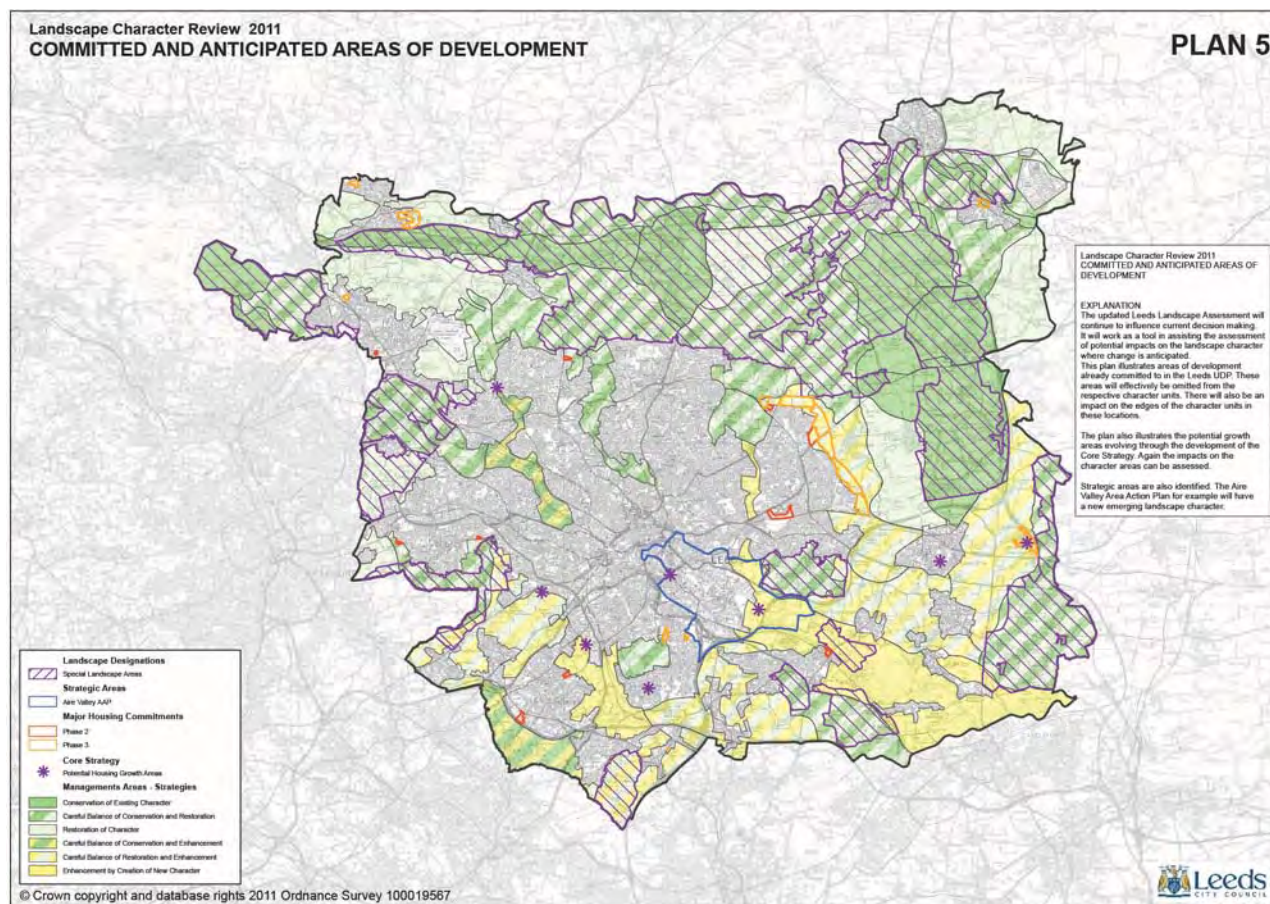
*'The character, quality and biodiversity of Leeds' townscapes and landscapes, including their historical and cultural significance, will be conserved and enhanced to protect their distinctiveness through stewardship and the planning process.'* (Policy P12: Core Strategy)

The NPPF makes this clear:

(para 109): 'The planning system should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes, geological conservation interests and soils...'



Plan 5 of the Leeds Landscape Character Review 2011 identifies key 'committed and anticipated areas of development' which could have an impact on the landscape. It indicates those areas in the north west which were identified for housing growth and Phase 2 and 3 major housing commitments, in 2011, in the (then) emerging Core Strategy.



These are: north Horsforth / Cookridge (growth area), Yeadon (Phase 2) and Guiseley (Phase 3). However, the Special Landscape Area south of Rawdon now identified in the Site Allocations Plan as a major housing site at HG2-12, HG2-41 and the safeguarded sites, is not identified for growth at all. It is quite clearly shown that, in contrast to these areas, it is a Special Landscape Area and Green Infrastructure Area with a stated management strategy of 'careful balance of conservation and restoration'.

In the explanation on this plan, it says:

*'The updated Leeds Landscape Assessment will continue to influence current decision making. It will work as a tool in assisting the assessment of potential impacts on the landscape character where change is anticipated.'*

On the Council's website, it says: *'Landscape Character Assessment can make a valuable contribution to the formation of planning policies such as allocation of land for development.'*

Yet clearly from the subsequent allocation of over 1,000 houses to sites within this area (and over 200 in safeguarded sites not actually 'safeguarded' – see **Green Belt** chapter) this landscape character review has not been used to influence decision making nor as a tool to assess potential impacts on the landscape character.

The allocation of such major housing development to this Special Landscape Area, with no account taken of the Landscape Character Assessment, would seem to be contrary to the Core Strategy policy P12 to conserve and enhance 'the character, quality and biodiversity of Leeds' townscapes and landscapes, including their historical and cultural significance, to protect their distinctiveness through stewardship and the planning process.'

The site allocations and the Site Allocations Plan as a whole are therefore not positively prepared or compliant with national policy (NPPF).

The inclusion of these sites in the Site Allocations Plan clearly is not the most appropriate option when compared with the alternative of building first on brownfield sites and other alternatives (see **Green Belt** chapter).

The site allocations and the Site Allocations Plan as a whole are therefore not justified.

### **III. The specific role of the sites and why they are not justified**

Within this locally and nationally important landscape, the land occupied by these sites, particularly HG2-12 and HG2-41, plays a key role. The elevated position and sloping topography of the sites, particularly HG2-12 and HG2-41 on the south-facing slopes of the Aire Valley, means that they have a particular value to the landscape, visible on the other side of the valley. The key quality of this landscape is its openness and greenness, which would be permanently lost with the major housing development proposed. The landscape and views are shown in the photomontage at the end of this chapter.

The Green Belt and Conservation and Heritage chapters contain descriptions of the contribution each site makes to the landscape, views, setting, tree coverage etc, in a critical analysis of the Council's green belt assessments. It is not proposed to repeat this here, but reference should be made to the greenbelt assessments and our critique of them on pages 3-12 of Green Belt and 2-11 of Conservation and Heritage, and also in our alternative greenbelt assessment spreadsheet.

### **Assessments flawed**

In the sustainability assessments of each site, the Council has assessed the Landscape / Woodland (SA19), according to the *'extent of woodland coverage and number of hedges and other landscape features. Does the site fall within a Special Landscape Area or include a Tree Preservation Order?'*

Under this score, site HG2-12 scores minus 2, the lowest score (ie most impact on) because the site is in a Special Landscape Area / Tree Preservation Order. However, this is directly contrary to the answers the Council gives for the greenbelt assessment, test 3, which asks 'does the site include areas of woodland, trees or hedgerows that are protected (protected ancient woodland) or significant unprotected tree / hedge cover?' The Council's answer for this question is 'no.' This is clearly contrary to the score it has given in the sustainability assessments. The character conclusion of the greenbelt assessment for test 4: special character and setting and also the overall conclusion also makes no mention of the SLA.

Further, question SA20 asks about Local Distinctiveness, in consideration of 'the scale of the site in relation to existing settlement and whether it would change the distinctiveness of the settlement.' The Council has given HG2-12 a score of '0', defined as: *'Greenfield site in scale with settlement or Greenfield site where development could still maintain distinctiveness.'*

Clearly this is wrong, as the answer should be: -1, large Greenfield site, out of character with settlement. This is a 4.9 Ha site, on which it is proposed to build 130 houses, on an (Council comments): 'isolated' settlement, 'not well connected' to the urban area, which would 'not round off the settlement'. These are the Council's own comments, from its own greenbelt assessment of the same site – test one (see Green Belt chapter). These

assessments are obviously in direct contradiction with the assessment that development would be 'in scale with settlement or where development could still maintain distinctiveness.' The greenbelt assessments and sustainability assessments contradict one another on the same themes.

The green belt assessment for this site also makes a flawed judgment about the distinctiveness of the site, concluding that site HG2-12 is '*not particularly visible within the immediate area*'. This completely misses the point that it is visible from the conservation area and the other side of the valley, and has a material impact on the setting and views of the conservation area (see Conservation chapter) – something that is also missing in its assessment of test 4, character and setting. The site may not be visible from the main road in Rawdon but it is visible from far wider afield (and the effects on the village shape will be evident from further afield too).

The greenbelt conclusions also fail to take into account any reference to landscape with regard to HG2-41, which is incredible, given the massive impact of the development on:

- a) the iconic views westwards from the A65 over these fields which serve to distinguish Rawdon from the urban area of Horsforth and shape its form and identity (indeed the character of Aireborough as a whole);
- b) views of the south-facing valley side from the other side of the valley at Calverley and Bradford and
- c) views and setting of the Cragg Wood Conservation Area.

If we look at the sustainability assessments for the other sites, we find the same contradiction, with them all scoring 0 for local distinctiveness impact, indicating that it is a 'greenfield site in scale with the settlement or where development could still maintain distinctiveness'. This is despite the fact that the maximum capacity of houses has been allocated for these sites, despite their proximity to the conservation area. (HG2-41: 777 and a school; 900 without; HG3-3: 35 houses; HG3-2: 85 houses and HG3-4: over 100 houses).

There are four issues here:

- 1) The sustainability assessments are not consistent with the greenbelt assessments. They have been carried out in isolation from the greenbelt assessments and it is not



clear how they have been used to make decisions on allocation. Which has primacy?

- 2) The site allocations do not seem to have much regard to Special Landscape Area, allocating houses to these areas despite a minus 2 score for landscape;
- 3) The assessments take no account of the relationship of the site to the wider landscape, with reference to conservation areas, Landscape Character Review management strategies, National Character Areas etc.
- 4) The assessment of landscape value is clearly inadequate, inconsistent and flawed. There are errors and inaccuracies in both greenbelt assessments and sustainability assessments with regard to landscape value.

A more appropriate alternative would have been to carry out a Landscape Value Study as part of a comprehensive Green Belt review, to assess the value of the landscape in relation to the Green Belt. Whilst landscape and visual matters are not directly cited in the five purposes of Green Belt in PPG2, they do have a particular bearing on the 'preservation of the setting and special character of historic towns' and 'safeguarding the countryside from encroachment'.

The Joint Green Belt Review of Coventry, Nuneaton and Warwick (2009) provides an example of such a study:

[http://www.coventry.gov.uk/downloads/download/682/evidence\\_base-joint\\_green\\_Belt\\_study\\_2009](http://www.coventry.gov.uk/downloads/download/682/evidence_base-joint_green_Belt_study_2009)

#### **IV. Conclusions**

1. The Special Landscape of this area is very important and should have had a bearing on site allocation and strategic growth. The fact that it did not indicates that the SAP as a whole is flawed.
2. The individual site allocations discussed are unsound because they play a very important role to this Special Landscape Area and are not justified compared with the more appropriate alternative of building on available brownfield land.

3. The sites should have been assessed properly. The fact that they were not shows that the plan has not been positively prepared, nor is consistent with national policy. The comprehensive Green Belt review would provide an appropriate alternative mechanism for doing so.



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# Rawdon & Horsforth - special landscape character setting

HG2-12 - 130 houses and HG2-41 777 houses & 2 schools







© darren sanderson photography

**HG2-12** Taken from bottom of 19 Southlands Avenue (low down) - tree line denoting Woodlands Drive, Thackley, Bradfordin distance

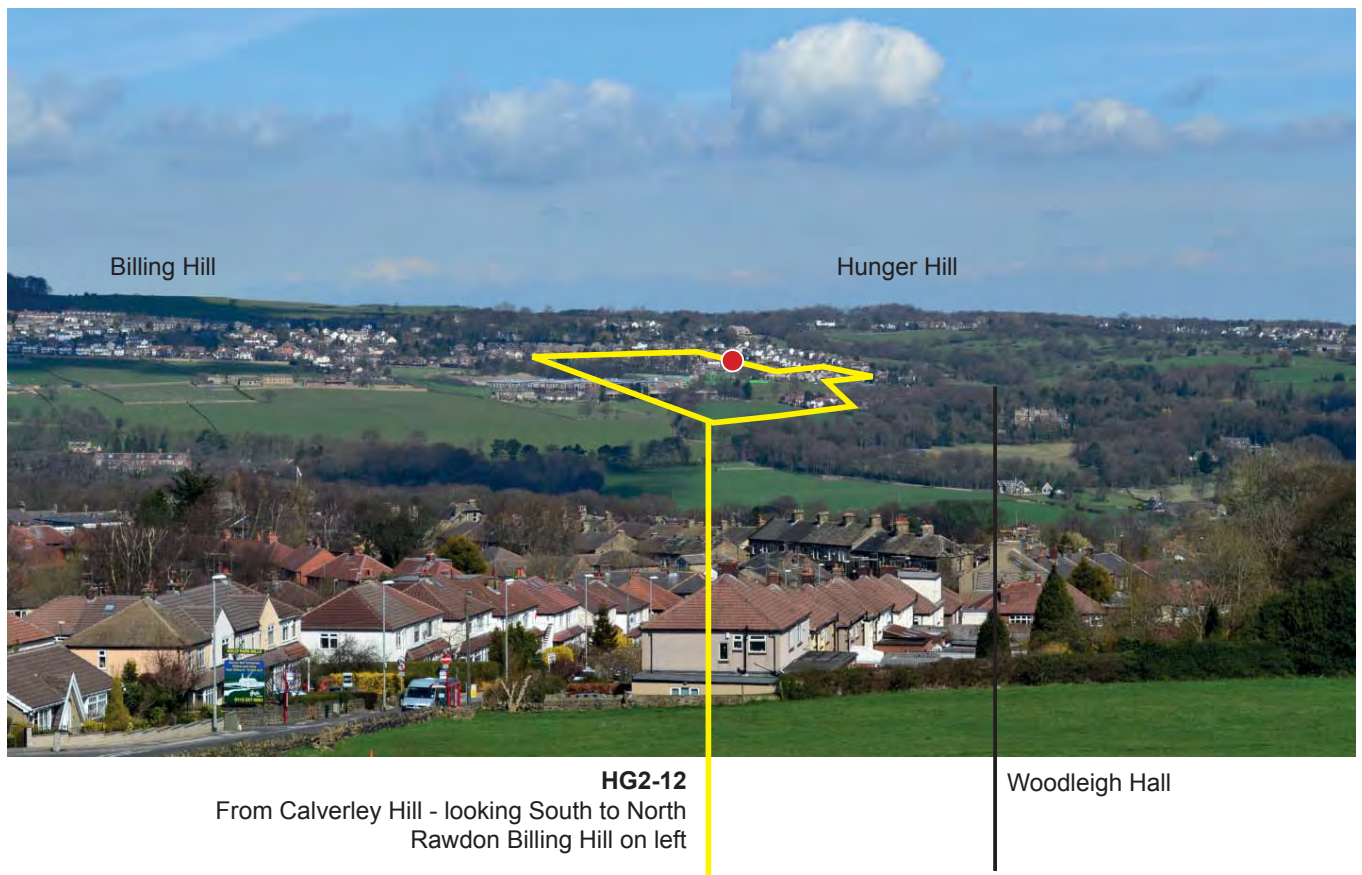


© darren sanderson photography

**HG2-12** Taken from top of Leeds Country Way footpath to North of site - looking due South  
East is HG2-12 North is Pudset to the left, Calverley to the right



## HG2-12 Site location - orientation



● Denotes location view taken from at opposite sides of the valley

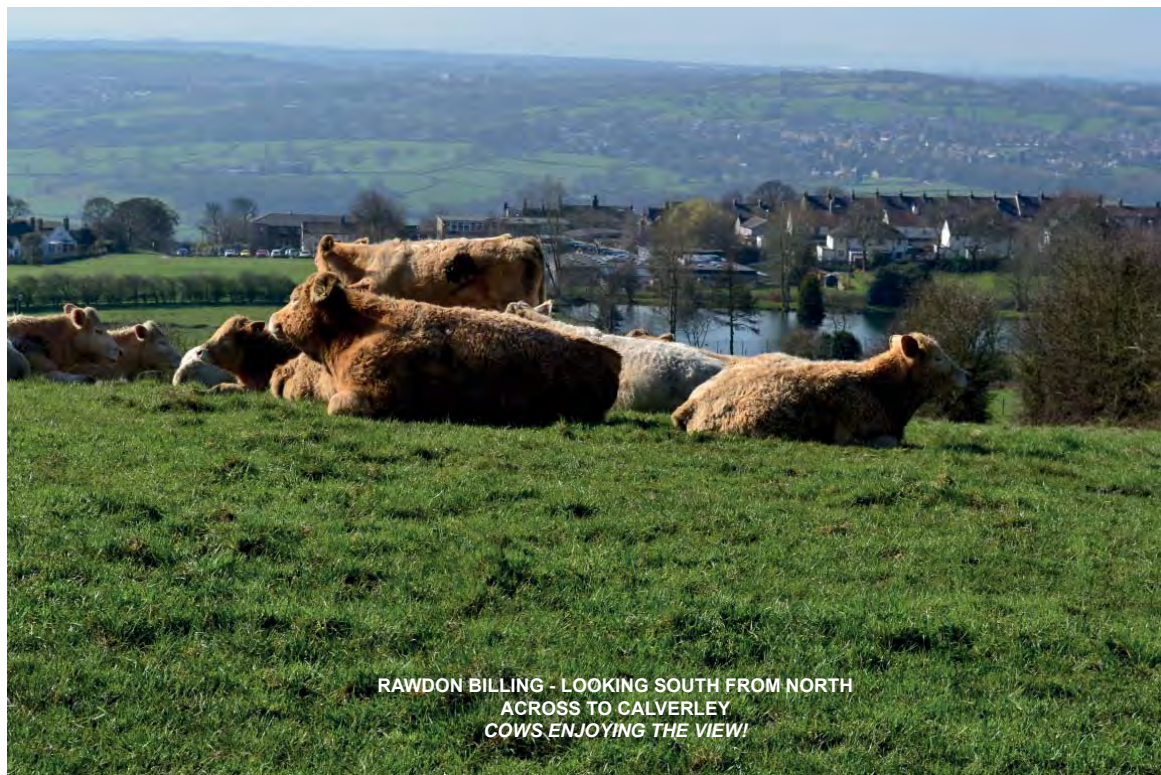


North East side of field looking North to South













Hunger Hill

**HG2-41** From Calverley/Rodley border - looking South to North  
Hunger Hill on right

**Redrow Homes development in progress  
on brownfield Clariant mills site**

**HG2-41** From Calverley - looking South to North Hunger Hill on right



**Redrow Homes development in progress  
just below bottom right of marked area, above farm buildings**





© darren sanderson photography

Woodleigh Hall to immediate right of site

Woodlegiht Hall to immediate right of site



Extract from LCC Cragg Wood Conservation Area Appraisal - 8 October 2012



- 20th century residential development around Acacia Park Drive, Acacia Park Crescent, Acacia Park Terrace and Fairway is of comparably smaller grain but reflects the ethos of the area as detached houses in relatively sizable plots.

- Open agricultural land surrounding the conservation area adds to the spacious and picturesque character of the area.

**1872 map showing the system of original carriage drives that structure today's layout of the area. The settlement form is dominated by large detached properties set in spacious grounds.**

Permission to reproduce maps granted by West Yorkshire Archive Service: Bradford, ref 1D78/174



Extract from LCC Cragg Wood Conservation Area Appraisal - 8 October 2012



## Chapter 4

# GREEN INFRASTRUCTURE

### I. Background

All the sites in Rawdon in the Site Allocation Plan are in the Strategic Green Infrastructure Area of the Aire Valley corridor: HG2-12, HG2-41, HG3-3, HG3-2 and HG3-4. The green valley corridor radiates outwards from Leeds city centre to the North West, providing important benefits.

The Core Strategy has identified Green Infrastructure as:

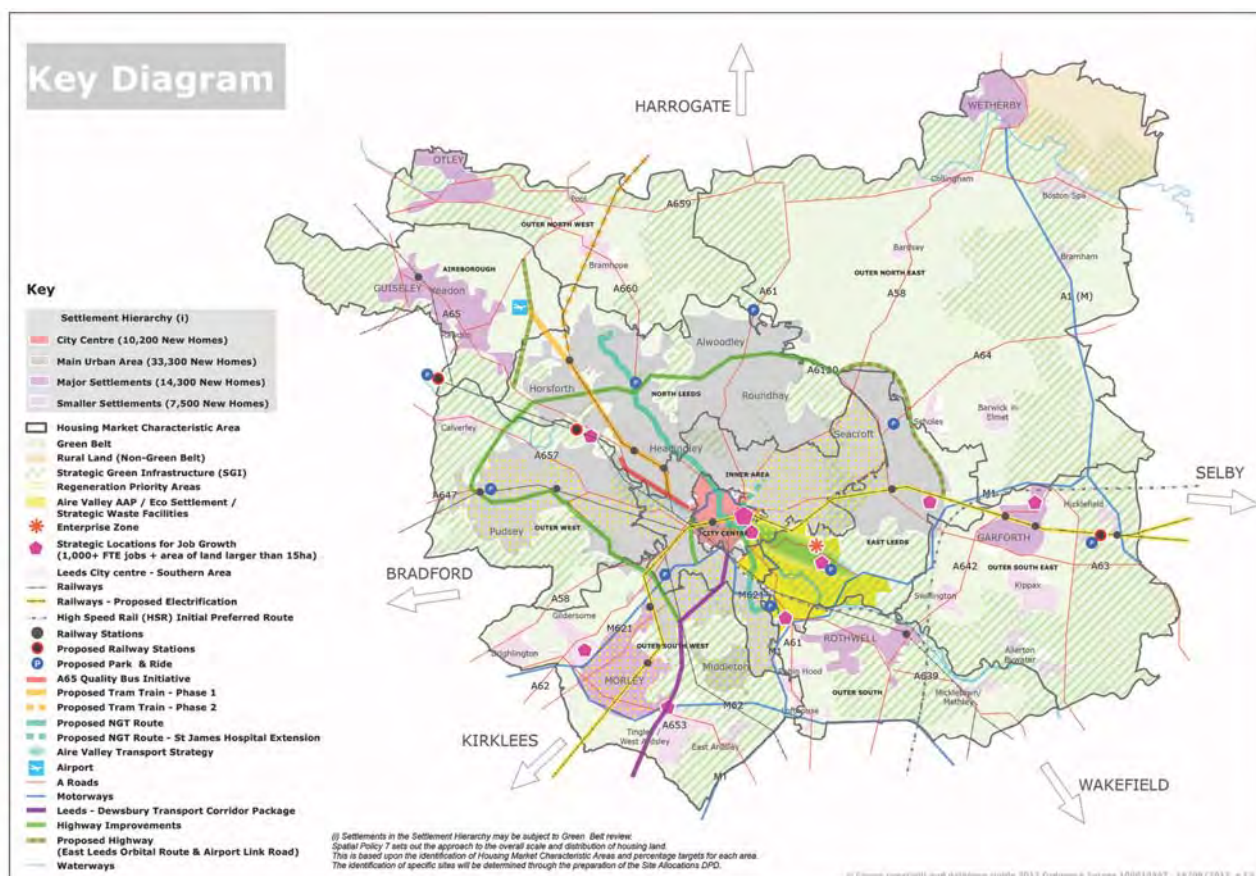
*'...the network of multi-functional green spaces, both urban and rural, which includes protected sites, woodlands, hedgerows, nature reserves, river corridors, public parks and amenity areas, together with green links. It extends from urban centres through green corridors to open countryside and supports the natural, recreational and ecological processes which are integral to the health and quality of life of sustainable communities. A key function of Green Infrastructure is to help maintain and enhance the character and distinctiveness of local communities and the wider setting of places.'* CS: 4.10.5

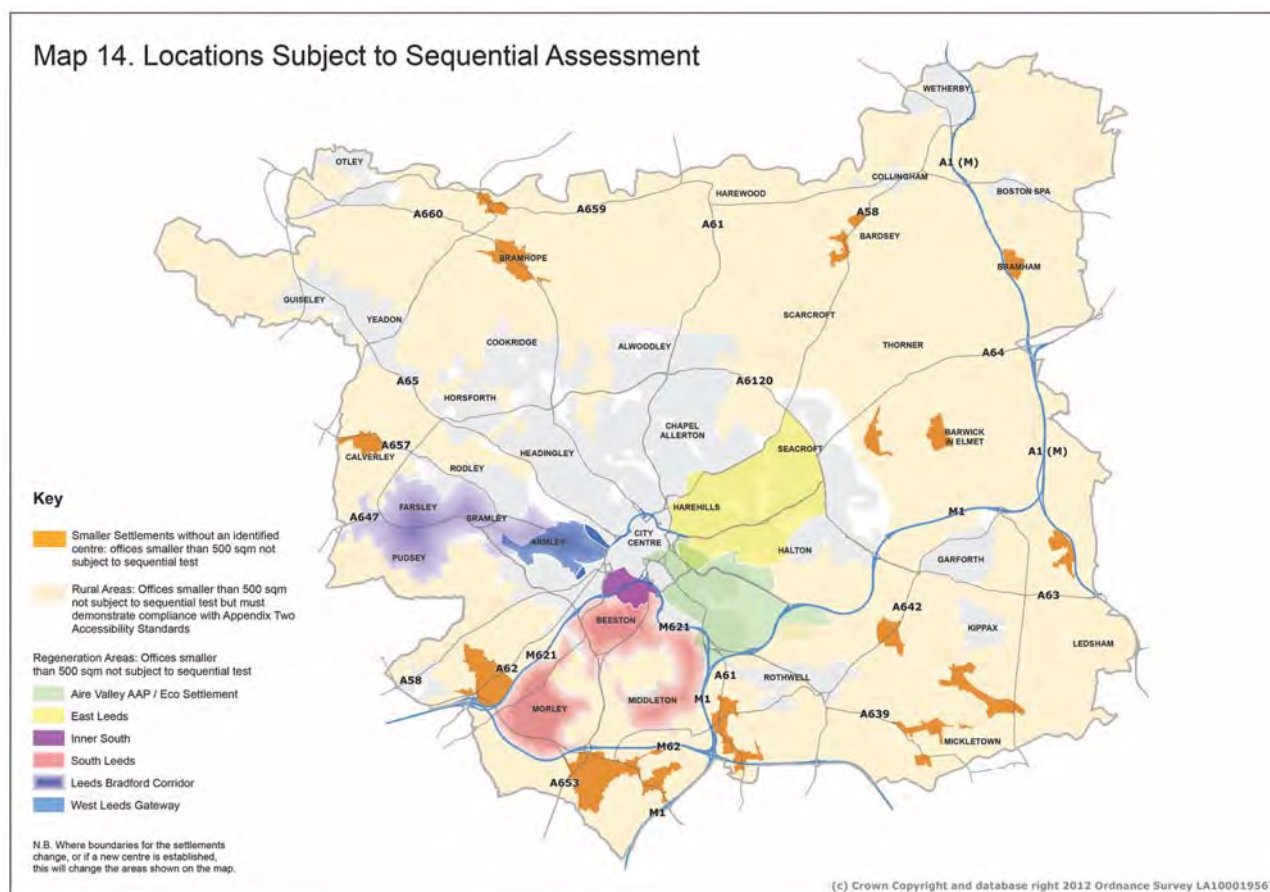
*4.8.2 A unique feature of the District also, is the extent to which urban areas have been influenced and shaped, by major areas of green space, green corridors and river valleys. These areas combine, to establish, a strategic network of Green Infrastructure (see Spatial Policy 13), which overlay both urban and rural areas and add significantly to the attractiveness and quality of life for the City.*

The conservation and enhancement of strategic green infrastructure is identified as a key priority of the local plan:

4.10.6: The Core Strategy and the LDF will ensure that the Strategic Green Infrastructure networks found across Leeds are maintained and strengthened in order to fulfil the functions illustrated below and any potential conflicts are minimised.

SP13: Within these areas the Council will maintain and, in partnership with others, enhance the following key corridors: (i) The Aire Valley, along the river and canal corridors and including; West Leeds Country Park.





Sitting in the heart of this Green Belt area, the sites that would be allocated to housing currently provide a cherished natural environment enjoyed by thousands of residents and visitors from urban areas throughout Leeds.

There are three formal ways in which the Green Infrastructure Area is successfully linked to the wider urban area: through inclusion in both of Leeds' Country Parks – Green Gateways initiative and by being on the route of the Leeds Country Way.

### West Leeds Country Park

This is a 32km circular trail running from the city centre, through the green corridor of the Aire Valley around Calverley, south of Pudsey and into Armley and Wortley.

The Trail follows the Leeds and Liverpool Canal towpath for 10 kilometres, tracking out to the north west along the scenic green corridor of the Aire Valley before dropping down into the well wooded countryside around Calverley Woodhall, Hillfoot and Pudsey on the Leeds Bradford border.

The sites in question above are all within the country park and the route runs along the Leeds-Liverpool canal, which enjoys long-distance views towards the fields occupying the site allocations.

<http://west-leeds-country-park-and-green-gateways.webplus.net/>

### North West Leeds Country Park

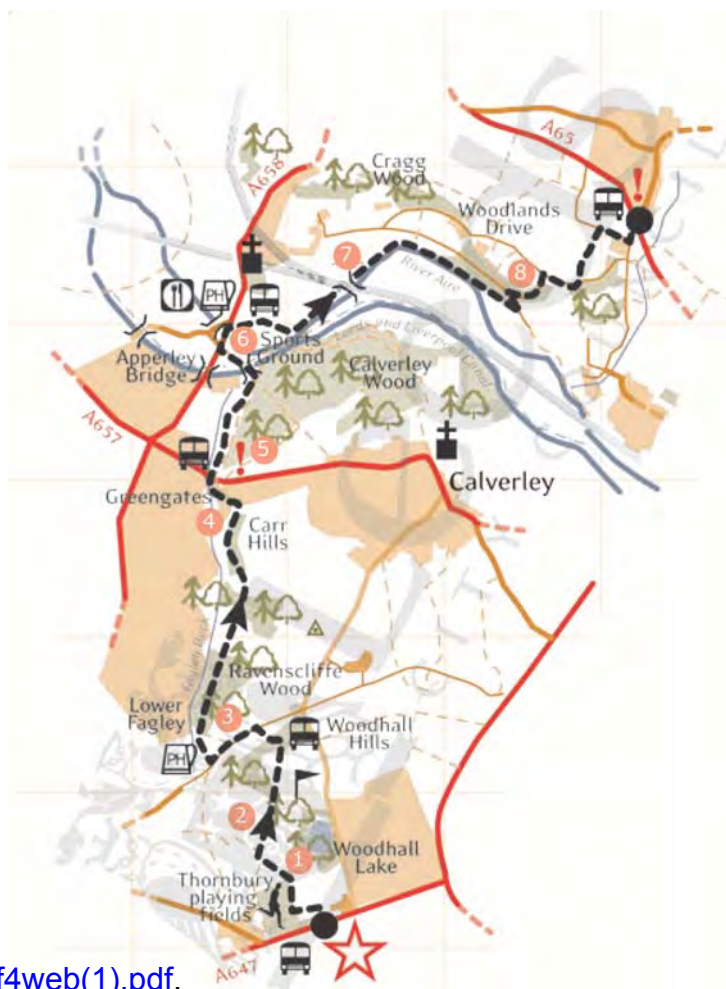
The North West Leeds Country Park is a 43km circular trail which runs between Woodhouse Moor Park and Otley utilizing the Aire Valley, Meanwood Beck and Oil Mill Beck green corridors besides the countryside south of the Chevin Forest Park:

<http://www.leeds.gov.uk/leisure/Pages/country-parks-and-green-gateways.aspx>

The route of this park runs all along Woodlands Drive, directly along all the southern boundary of **HG2-12** and the southern boundary of **HG3-3**.

### Leeds Country Way

This is a 62 mile-long footpath around Leeds that takes users through some of the most beautiful and varied countryside surrounding the city.



[http://www.leeds.gov.uk/docs/lcweb4web\(1\).pdf](http://www.leeds.gov.uk/docs/lcweb4web(1).pdf)



The route of the Leeds Country Way runs north-south directly adjacent to the western boundary of **HG2-12**, and west-east directly adjacent to the southern boundary of **HG3-2** and north-south directly adjacent to part of the western boundary of **HG3-3**.





Additionally, Woodlands Drive and Knott Lane provide a key route for enjoying this part of the scenic Aire Valley for thousands of walkers, runners, cyclists and horse-riders, through a network of public footpaths and bridleways.



### Role of the sites in Green Infrastructure Area

The countryside occupied by the allocated and safeguarded sites fulfils the purposes of Green Infrastructure by:

- helping to connect the urban areas of the city with the countryside (both Country Parks and Leeds Country Way);
- allowing people from all around Leeds and Bradford to enjoy opportunities to access the countryside and improve their health and well-being (evidenced by the many walkers, runners, cyclists and horse-riders who use Woodlands Drive and its rights of way every day);
- providing a precious natural environment for wildlife, flora and fauna (covered in the **Biodiversity and Ecology** chapters); and

- as the ‘green lungs’ of the city, making a very important contribution to climate change mitigation (see ‘Trees’ within **Biodiversity and Ecology** chapters).

The Country Park and Green Gateways initiative seeks to conserve and enhance the character and significance of parks, countryside and green within it. Its aims are to:

- provide trails and recreation areas (see Leeds Country Way and routes of Country Parks, adjacent to sites)
- include and protect diverse wildlife habitats (ancient woodland and BAP priority habitats adjacent to sites)
- preserve the countryside (sites are in the countryside, Grade 3 agricultural use, in Green Belt)
- involve local communities in planning and decision making (no consultation on site allocations HG2-12 or HG2-41 – see **consultation** chapter)

See <http://www.leeds.gov.uk/leisure/Pages/country-parks-and-green-gateways.aspx>

Key to these aims are:

- An appropriate and sustainable availability of green space
- Adequate quality recreational areas
- A diverse range of wildlife habitats
- Strong community involvement

See <http://west-leeds-country-park-and-green-gateways.webplus.net/>

## **II. Development on these sites is not justified and not positively prepared**

The development of these sites for housing would be contrary to the aims of their Green Infrastructure designation and defeat the Country Parks initiative by:

- removing and affecting the enjoyment of key open recreation areas (Cragg Wood Conservation Area, West Leeds Country Park, North West Leeds Country Park)
- reducing the enjoyment of key trails and recreation areas (Leeds Country Way and the Country Parks)

- encroaching on the countryside (the Green Belt incorporating these areas)
- reducing or removing access to diverse wildlife habitats (including BAP priority habitats in HG2-12, HG2-41, HG3-3 and HG3-4)
- not involving the local communities in planning and decision making on any of the above (see chapter on community consultation)

### **Defining characteristic of Aire Valley Strategic Green Infrastructure Area**

The Core Strategy says that *'At this strategic level, Green Infrastructure includes natural and managed green areas in both urban and rural settings. It also includes the strategic connections between green areas for the benefit of people and wildlife.'*

The key characteristic of Green Infrastructure is its 'greenness' and the fact it is connected to other green areas as well as to the urban population. The site allocations would build over these green areas and reduce the strategic connections between green areas (see the routes of the Leeds Country Way and both country parks). These areas are already very well connected to, and utilised by, the urban population. Building over them would therefore diminish the area for the enjoyment of the urban population, rather than enhance it.

The defining feature of this part of the Aire Valley is precisely its openness and 'scenic' green countryside setting (West Leeds Country Park), where the housing is historically low density (Cragg Wood Conservation Area Appraisal, as seen objectively on a map). This is what its tens of thousands of visitors come to enjoy. The allocation of 130 houses to HG2-12 and 777 houses plus a school (900 without) to HG2-41 would clearly destroy this quality.

Furthermore, the lack of legitimate policy for safeguarded land means that these areas are likely to come forward in the plan period as well, creating a large block of housing around Knott Lane / Woodlands Drive right in the heart of both country parks, the conservation area and the Leeds Country Way.





Woodlands Drive

Looking East to South West

Site HG2-12 to right

### **Cumulative impact**

As above, these site allocations must not be regarded in isolation, but must be considered cumulatively. In Rawdon / Horsforth, the combined allocations would cause over 1,000 houses to be built (or 900 and a school) all visible in the valley from miles around. This is a vital green corridor which is a highly distinctive part of the landscape of the city, enjoyed by tens of thousands every year. The topography of the land and the elevated position of these sites in the valley landscape means that these areas are visible from a long-distance and therefore the effect of inappropriate housing development is greatly increased.



The large-scale urbanisation of these vital ‘green lungs’ is clearly contrary to Core Strategy policy which is the desire to: ‘*maintain and enhance an integrated network of Strategic Infrastructure in the long term.*’ (4.10.5)

This greenness and openness of the valley, compared with the urban areas that surround it, define the character of this part of the Aire Valley and the villages of Rawdon and Horsforth, valued by the whole city. Development would clearly be contrary to this point in the Core Strategy which says: ‘*A key function of Green Infrastructure is to help maintain and enhance the character and distinctiveness of local communities and the wider setting of places.*’

### **No provision in Site Allocation Plan**

There are not many green areas left in Leeds. The Core Strategy rightly identifies these areas as precious to the wider population for that reason seeks to maintain and enhance them. Yet the Site Allocations Plan takes no account of this. There is no plan for the maintenance and enhancement of Green Infrastructure Areas; no reference to them in the site assessments. The site allocations would not maintain and enhance this Strategic Green Infrastructure area.

### **‘Appropriate circumstances’**

The Core Strategy says that: ‘*The inclusion of areas as forming part of the Green Infrastructure network does not necessarily mean that no development can take place in these areas. Development opportunities in appropriate circumstances can provide a basis to ensure that Green Infrastructure can be delivered or achieved.*’

As demonstrated above, the specific location of these sites clearly makes them particularly important strategically. These areas are already very well connected to, and utilised by, the urban population and therefore are hardly the 'appropriate circumstances' for major development.

### **More appropriate alternatives**

Urbanisation of these highly valued, strategically important green areas would clearly be inappropriate, compared with the more appropriate alternative of building in areas which are not in Green Infrastructure Areas, such as the many available brownfield sites not allocated in the plan.

The appropriate mechanism for an assessment of the value of Strategic Green Infrastructure Areas, with a view to developing a positive strategy for its conservation and enhancement and minimising the impact of development, may be through a comprehensive Green Belt review similar to those conducted by other local authorities (see **Green Belt** chapter). This, and the consideration of brownfield alternatives, would be more appropriate alternatives than the Site Allocations Plan as currently drafted.

The plan and site allocations in question are therefore not justified or positively prepared and these site allocations are unsound.

### **III. Not consistent with National Policy**

For the reasons listed above, the site allocations are not consistent with the NPPF which says:

*'Local planning authorities should: set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure.'* (para 114)





Visitors from all over Leeds frequent Leeds Country Way. We put up a Visitors comments box at the bottom of the footpath - South West Corner, junction with Woodlands Drive, half way through the public consultation - to see if people were concerned about the proposed site allocations plans for the area. The weather has been bad so we did not expect the response to be high, however these a selection of the ones we got scanned in time to submit in our response.



25<sup>th</sup> October 2015. 20 South View Greengates  
 I'm a regular early a.m. walker  
 and am appalled at where  
 140 houses are to be built!  
 Why can't they build nearer the  
 main road! (Guisley/Leeds Rd i.e.).  
 Once they start there'll be many more  
 built down to the 'Private Road' I've been  
 allowed to so enjoy - I know - I'm 80 & have seen  
 it many times.

Because of the peace  
 & quiet. The wildlife  
 we used to bring  
 our sons here for  
 nature walks & now we  
 bring our ~~son~~ grand-  
 children here. We've  
 been coming here over  
 35 years.  
 Please don't turn it  
 into a Housing Estate

Mrs Stewart  
 Pudsey

Beautiful nature for relaxing walks  
 will be ruined and disturbed by  
 adding extra population to this  
 area with increased traffic.  
 Traffic around this area is already  
 shocking around 9am and 5pm  
 adding to this will be just nightmare.  
 Thank you

Joe Murphy  
 Calverley

teach9@hotmail.com

I like to run, walk and  
 cycle in this area of  
 natural beauty. I say No  
 to 414 houses.

It is  
 Unique at present.  
 You're so right!  
 Builders have been granted rights to  
 build over common land - the Local  
 "Green" up to now. Where? From Calverley  
 Avenue, Greengates down along side  
 the main Horwath/Leeds Airport/Bradford  
 Road nearly up to the present  
 development along side the  
 Canal. B. Hubbard  
 (Mrs.)

Mr & Mrs Robinson

MR + MRS K DENNEY

83A RODLEY LANE

Kevin - denney @ leathrow . com

- No houses here it's too  
 beautiful and it would be  
 spoilt forever

We like walking in the fields with  
 our dog.

Jenny age 7  
 L syon lane poudon.

## RAWDON RESIDENT

This beautiful area must be protected at all costs, it is a breathing space in an ever congested suburban environment of today.

Born in Rodley in the 1940s we would walk via Canal river to Rawdon woods to collect horse chestnuts to play conkers. What happy memories of those days

Spent with grandparents, parents, brothers and family & friends & dog. This is a corridor for wildlife of all species to exist in. Please do not break this narrow breathing space of green for the sake of another development of bricks & mortar. I want to continue visiting this lovely area for years to come now with my own grandchildren.

I HAVE WALKED THESE WOODS FOR 15 YEARS TO APPRECIATE THE WILDLIFE. DEER, JAYS, SPARROWS AND A LOT MORE. IT IS A SACRED PLACE AND SHOULD BE LEFT UNTOUCHED. REGARDING MORE DWELLINGS THE ROAD CAN'T COPE AS IT IS AND ALREADY EITHER SIDE OF WOODLAND HAS BEEN DEVELOPED. 16. SHANDON STREET BRING BOTTOM, THAT IS ENOUGH TO VISIT THIS BEAUTIFUL ALREADY. MORE DWELLINGS MORE COUNCIL TAX THAT WITH THEM WONT

MR NICHOLAS KENDALL

63 LEEDS ROAD RAWDON

LS19 6NT

E-MAIL NICKYKENDALL63@GMAILDOTCOM

Dear Planner. <sup>from Helen SAYES</sup> + NOAH <sup>Buckstone Hall</sup>

I live on Cuffe Dr. - walk my dog, with many other local residents around the Cragg Woods area. There are so many reasons to respect & protect this area. here are a few. PTO.

1. The Community feel to this area is at risk.
  - 2, well simply become an extension of Horsforth
  - 3) In a worse, to walk in tranquil country setting is paramount to (all) peoples well being. (Ring Rd)
- 4) The traffic is already unmanageable.

BEN DYSON  
HORSFORTH - CS18 5BU (8)  
men7bd@yahoo.com

- I love running along here & have done for many years. It would be terrible to lose this, can't.

Since the A65 roundabout improvements I have never seen so many queues

on the A65 & surrounding rd's

- The hospital which can't cope!

We like walking in the fields:

Lyon lane - 28  
Isia Beffoth  
age - 7 Rawdon  
Leeds

we want them to stop  
building the houses.  
over 7

From Noah Gu LS196LL

This green & pleasant land is not  
about big swathes of hake district  
or Cotswolds or moorland, it is  
about pockets of "green" near to  
urban areas where everybody can  
access healthy living, nature,  
fresh air - he likes.

Please don't take that away  
from the community. Thank you

ANDY PEARSON  
CUISELEY

andy@niges.net

NO BUILDING ON GREEN FIELD

PETER MELLINBELL

LOW GREEN, RAWDON  
PETER.MELLINBELL@GMAIL.COM

THIS IS AN AREA OF OUTSTANDING HISTORICAL  
BEAUTY WHICH HAS BEEN USED BY  
GENERATIONS & MUST REMAIN SO

ANY MODERN BUILDING WOULD RUIN & RUDE  
THE HISTORICAL IMPORTANCE OF THE AREA  
LOST FIGHTING THE FIGHT & FIGHTING FOR  
IT! SO!

V.2

completely unnecessary  
in an area with few large  
employers - out of balance

A. Jakes

Rawdon

- To connect with the natural  
environment after stresses of work
- To feel uplifted
- To escape urbanisation!
- To appreciate and value Greenbelt  
land not destroy it. Devote Greenbelt!

Gary R. Williams

3 Sincith Wood Drive

gary.williams@thinkofficesupplies.  
co.uk

I object strongly to the  
proposed plans.



We enjoy the quiet rural nature,  
it's a small piece of the countryside  
without having to travel far.

Can't see why this would need to be  
spoiled.

DG + PG  
LS13

daveg.leeds@ntlworld.com

JANE LAURIE  
CUISELEY

janelaurie@hotmail.co.uk

NO BUILDING ON GREENBELT

Brian + Kathy Thompson

Rawdon

thompk00@gmail.com

Have objected to building - brown sites not used  
A66 very congested currently. No houses for lot of  
buyers. Will spoil Rawdon

Jr J BYRNE

from North Bradford  
but frequent walkers in this  
area. We love the beauty,  
peace & quiet of this area  
which is virtually on our  
doorstep

email jby992@gmail.com

Jeany, Brandy

It is pointless opposing housing when net  
immigration is running at 330,000 a year

If you oppose housing then you have to  
oppose immigration as well as all the  
new people have to live somewhere.

If you voted Labour, Cons or Lib Dem in  
the election you are getting what you voted for

K COSSEY  
LS28 5BC

Kerishaw34@btinternet.co

Green Belt is in danger  
TRAFFIC SCHOOLS!!

ASSQUIRE@NTLWORLD.COM,  
Once we loose our greenbelt  
its gone forever.  
There are many brownfield  
sites available in and around  
Leeds.

It's the greed and prices that  
make them want to build here.  
It is not there's to build on!

Nicola A. Williams

3 Snaithe Wood Drive

nikki.williams@thinkofhree  
supplier.co.uk

I object strongly to the  
proposed plans



M. HARGREAVES

RAWDON

PARKDALE @ TALK TALK - NET.

JUST REDICULOUS, NO MORE HOUSES  
WANTED. - ROADS, SCHOOLS etc  
CAN'T COPE.

DO NOT BUILD IN THIS  
AREA IT IS TOO BEAUTIFUL  
TO BE SPOILT  
S. Beebe

Helene Longshaw  
THE COACH HOUSE  
PETERBOROUGH  
CAVENDISH LS28 5EE

helene.longshaw@btinternet.com  
- Co. UK.

Please don't take any more of  
our greenbelt away.  
+ TRAFFIC !!!



## Chapter 5

# ECOLOGY AND BIODIVERSITY

### Rawdon - Biodiversity and Ecology

**BACKGROUND** (taken from LCC Biodiversity Action Plan for Leeds)

<http://www.leeds.gov.uk/docs/Leeds%20BAP%20combined.pdf>

**Rawdon is in the district of Aireborough** which is The Southern Pennines Natural Area. This comprises the gently sloping, wild, open plateaux of acid Millstone Grit rock, high above the urban areas of Manchester, Huddersfield, Burnley, Blackburn and Bradford. In Leeds it covers Hawksworth Moor (the most Westerly part of Aireborough), the northern side of Guiseley and Otley, stretching to Pool in the east.

It is an *internationally important area*, special for its heather moorland and the variety and rarity of the birds it supports. These include red grouse (*Lagopus lagopus scoticus*), merlin (*Falco columbarius*) and twite (*Carduelis flavirostris*). The heather moorland is part of an extensive mosaic with wet heath, blanket bog and acidic grassland.

Down-slope from the open moor, on more fertile soils, the land has been enclosed for winter grazing and summer hay crops. This 'inbye' is important for breeding birds such as **curlew** (*Numenius arquata*), **redshank** (*Tringa totanus*), **lapwing** (*Vanellus vanellus*) and **snipe** (*Gallinago gallinago*) and many meadows still support colourful swards with ragged robin (*Lychnis flos-cuculi*) and cuckoo flower (*Cardamine pratensis*), devil's bit scabious (*Succisa pratensis*), betony (*Stachys officinalis*) and pignut (*Conopodium majus*). Clough woodlands provide suitably humid environments for lush growths of ferns and mosses, including the Killarney fern (*Trichomanes speciosum*).

Although the Leeds district has only a small area of the Southern Pennines Natural Area within its boundary, it includes part of the South Pennine Moors Site of Special Scientific Interest and Special Protection Area.

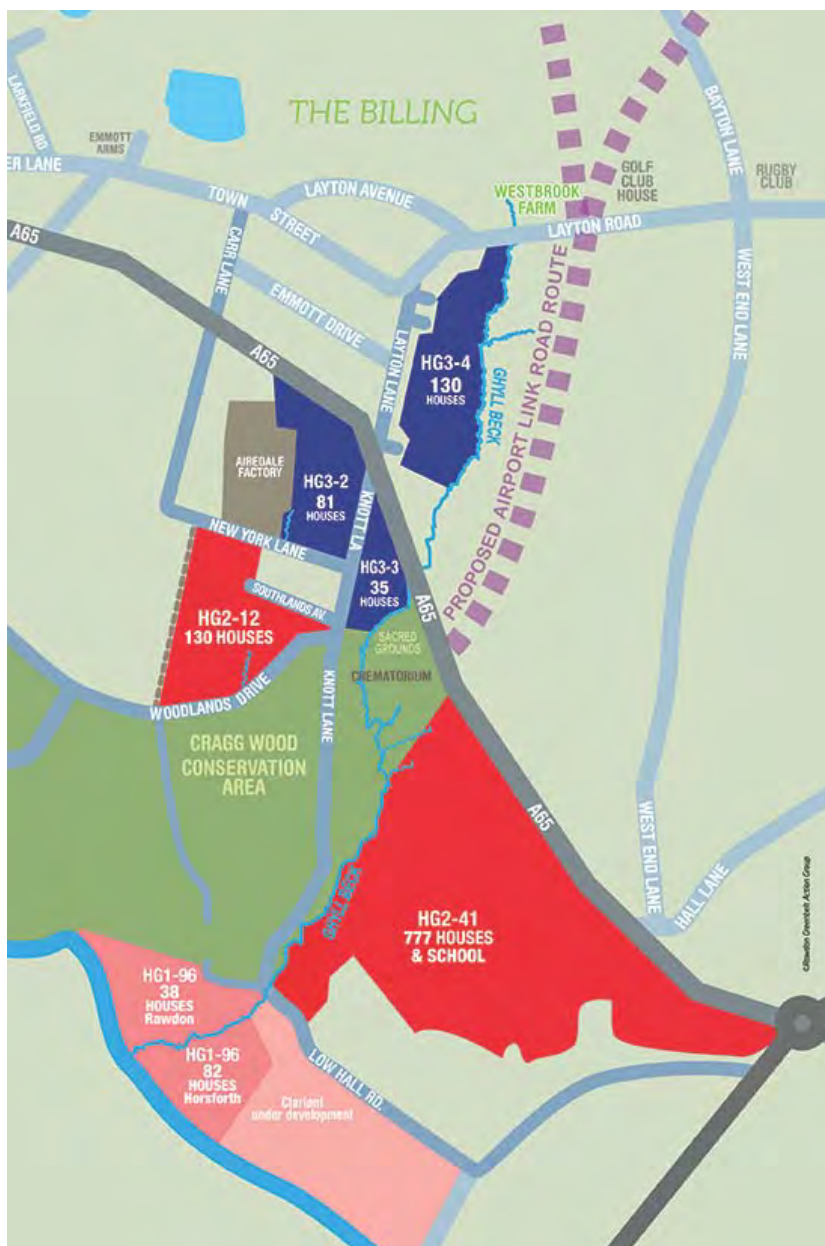
***This is an extensive area of international importance and, within Leeds, adds significantly to the diversity of habitats and species.***

#### **Rawdon Sites within the Leeds City Council (LCC) Site Allocation Plan (SAP)**

Four sites within Rawdon Village have been allocated or safeguarded for housing totaling 414 dwellings. LCC refer to these as **HG2-12, HG2-2, HG3-3, HG4-4** – see below. **HG2-12 is allocated for 130 dwellings.**

A neighbouring site - **HG2-41** on the geographical border with Horsforth town has also been allocated for a single development of **777 dwellings plus 'school'**.

Rawdon Village is located in the most South Easterly corner of Aireborough HMCA.



**STYLISTED MAP OF SITES**  
– produced by RGAG

## **RAWDON – A natural, balanced environment**

The Council's site **HG2-12** (*allocated for 130 houses*) borders **Cragg Wood Conservation Area**. Conservation Areas do not exist in isolation but are enhanced by their setting. The special position of the **Cragg Wood** conservation area on the steep slopes of the Aire Valley means that it derives particular character and value from its landscape setting, and in turn defines this important landscape, which is also a **Strategic Green Infrastructure Area** and **Special Landscape Area**. It forms a vital part of the narrow **greenbelt** corridor separating Leeds and Bradford through the Aire valley. It is within the **West Leeds Country Park** and forms the setting of the **Leeds Country Way** and is highly valued by the residents of the area and visitors from further afield (see Appendix XX of visitor comments at end of the Report).

Ancient woodland, tree lined avenues, surviving elements of the landscaped grounds, natural bluebell, in particular the boundary belts and mature trees, form a dominant element of the special character. The wooded area of **Rawdon Cragg Wood** sits on the south-facing side of the

Allocated housing sites **HG2-12** and **HG2-41** are adjacent to and in the immediate setting of, the conservation area and safeguarded site **HG3-3** is within it. Safeguarded sites **HG3-2** and **HG3-4** are very nearby.

The development of sites **HG2-12**, **HG2-41** and **HG3-3** would have a major adverse impact on the conservation area and thus the biodiversity and thriving ecology which exists in harmony with the modest volume of existing dwellings.

Bevys of Roe Deer, cetes of badger and fox, tawny owl, little owl, red kite, palmate newt, rafts of Otter thrive in this area because the landscape provides rich habitats and safe havens. The ancient **Ghyll Beck** (know as Red Beck because mineral deposits are brought up in times of heavy rain) begins at the north of the sloping site **HG3-4** and runs directly alongside **HG3-3** into the sacred grounds of the Crematorium, down the slope along the Western side of Horsforth site **HG2-41** (*through the ancient Riverside Mill brownfield site currently under development **HG1-96***) and drains directly into the River Aire.

**Ghyll Beck** is the geographical and naturally physical Boundary between Rawdon Village and Horsforth Town. The beck and adjacent fields have public access via pathways. The length of the Beck is naturalized and respected locally as a hub of nature. The tree lined route is, on the whole entirely protected by TPO's and is richly diverse species – please see separate Chapter 2 'Trees Around Rawdon Sites' for details of an extensive Tree Survey.





## **Airedale Air Conditioning Factory**

Airedale Air Conditioning (AAC) is the single largest business by far in Rawdon, employing some 350 staff.

It started on the site of an 18<sup>th</sup> Century Mill and has grown to become a major business. After a major fire in September 2013, they decided to re-build their business rather than relocate because they were such an important employer within the community, in spite of offers from housing developers to buy the land from them.

The factory is located between HG2-12 and HG3-2 – please see RGAG stylized map on previous page)

AAC commissioned a Biodiversity Report from a specialist consultant, WSP Environmental Ltd. AAC are keen to retain the landscape setting of the factory and the village for the same reasons as RGAG. The factory site includes two old ponds which have been there since the first mills appeared. The ponds drain into underground becks which come out in HG2-12 and drain into Ghyll Beck and the River Aire.

Palmate Newts are believed to have originated from these ponds live or have been found in two residents gardens on Southlands Avenue – see separate Chapter on ‘Local Wildlife Sightings’.

AAC have kindly agreed to share their **Ecology Report** with RGAG and we attach it as Appendix XX. However, the following are extracts pertinent to the sites HG2-12 and HG3-2.

“The Site mainly comprises buildings and hard standing with small areas of semi-improved neutral grassland, amenity grassland and scattered trees. The wider area surrounding the Site contains two fields of semi-improved neutral grassland in the north west and north east and two fields of improved grassland in the south west and south east. Two ponds, hedgerows, small areas of dense and scattered scrub, tall ruderal vegetation and scattered trees are also present immediately bordering the Site.

The habitats are generally of low intrinsic ecological value with the exception of hedgerows on Site and two ponds off Site. Hedgerows and ponds are listed as Habitats of Principal Importance under Section 41 of the NERC Act 2006 and are therefore capable of being material considerations in planning decisions. The habitats on the Site have the potential to support badger, bats and breeding birds.”

### **Bats**

3.2.9 The habitats present on Site and in the wider area surrounding the Site, include mixed woodland, scattered trees, scrub, hedgerows and semi-improved neutral grassland. These habitats on Site and within the surrounding area all provide potential commuting and foraging habitat for bats and provide potential connectivity to suitable features within the wider landscape.

### **Roosts**

The Survey revealed one confirmed bat roost in one of the site trees, plus high and moderate chances of bat roosts in other trees. Many trees within the Southlands Avenue residential area and New York Lane area are homes to roosting bats – a common local sight.

## **PROTECTED AND NOTABLE SPECIES**

The following Desk Study revealed an array of protected and notable species within 2km of the site:-

### **“3.1 Desk Study**

3.1.1 The results of designated sites and notable and protected species identified in the 2012 desk study (BL Ecology, 2012) are summarised below.

3.1.2 There is one statutory site within 2km of the Site, which comprises a section of the Leeds-Liverpool Canal that is designated as a Site of Special Scientific Interest (SSSI) due to the presence of diverse aquatic flora and fauna within the channel. There are eight non-statutory designated Local Wildlife Sites (Local Nature Areas (LNAs)) within 2km of the Site, the closest is Cragg Wood (two LNAs) – located 0.6km south east of the site.

3.1.3 The following records of *protected and notable species* were received:

- Great crested newt (*Triturus cristatus* );
- Palmate newt (*Lissotriton helveticus* );
- Smooth newt (*Lissotriton vulgaris* );
- Common toad (*Bufo bufo* );
- Common frog (*Rana temporaria* );
- Noctule (*Nyctalus noctula* );
- Common pipistrelle (*Pipistrellus pipistrellus* );
- Soprano pipistrelle (*Pipistrellus pygmaeus* );
- Badger (*Meles meles* );
- Otter (*Lutra lutra* );
- Water vole (*Arvicola amphibious* );
- Brown hare (*Lepus europaeus* );
- Hedgehog (*Erinaceus europaeus* );
- Tubular water-dropwort (*Oenanthe fistulosa* ); and
- Water-soldier (*Stratiotes aloides* ).

3.1.4 **Twenty-six bird species** were also recorded including three species listed on **Schedule 1 of the Wildlife and Countryside Act:**

- Kingfisher (*Alcedo atthis* )
- Redwing (*Turdus iliacus* )
- Barn Owl (*Tyto alba* ).

A further survey revealed:

**Forty-four records of amphibians**, including

- Great crested newt (*Triturus cristatus*)
- Palmate newt (*Triturus helveticus*)
- Smooth newt (*Lissotriton vulgaris*)
- Common toad, and common frog.

The closest record is a common frog 1.2km to the east of the site, with the nearest great crested newt record 1.8km to the north-west of the site;

The HSI assessment of the two ponds produced scores of 0.71 for both ponds....

A study by Oldham et al. (2000) found that a score 0.43 was the lowest score in which great crested newts were found to be present, and therefore scores of 0.71 for *the ponds adjacent to the site indicate potential for great crested newt presence*.

Thirty-seven terrestrial mammal records, including

- badger (*Meles meles*) 1.2km from the site
- otter (*Lutra lutra*) 1.5km to the south
- water vole (*Arvicola amphibius*) 1.8km to the south
- brown hare (*Lepus europaeus*) 1.5km to the north-east, and hedgehog
- (Erinaceus europaeus) 1.9km to the south-west of the site;
- 

Twenty-six records of birds, including species listed on Schedule 1 of the Wildlife and Countryside Act such as

- barn owl (*Tyto alba*) 1km to the south-east and
- kingfisher (*Alcedo atthis*) 1.2km to the southwest,
- and species listed on the BoCC Red and Amber lists such as
- starling (*Sturnus vulgaris*)
- song thrush (*Turdus philomelos*)
- kestrel (*Falco tinnunculus*)
- grey wagtail (*Motacilla cinerea*) at 1.1km to the south-west; and

Two flowering plant records, comprising

- tubular water-dropwort (*Oenanthe fistulosa*)
- water-soldier (*Stratiotes aloides*), both 1.8km to the north of the site.

### **Habitats**

3.2.7 ... Hedgerows and ponds are listed as Habitats of Principal Importance under Section 41 of the NERC Act 2006 and are therefore capable of being material considerations in planning decisions.

### **Sites of Nature Conservation Interest**

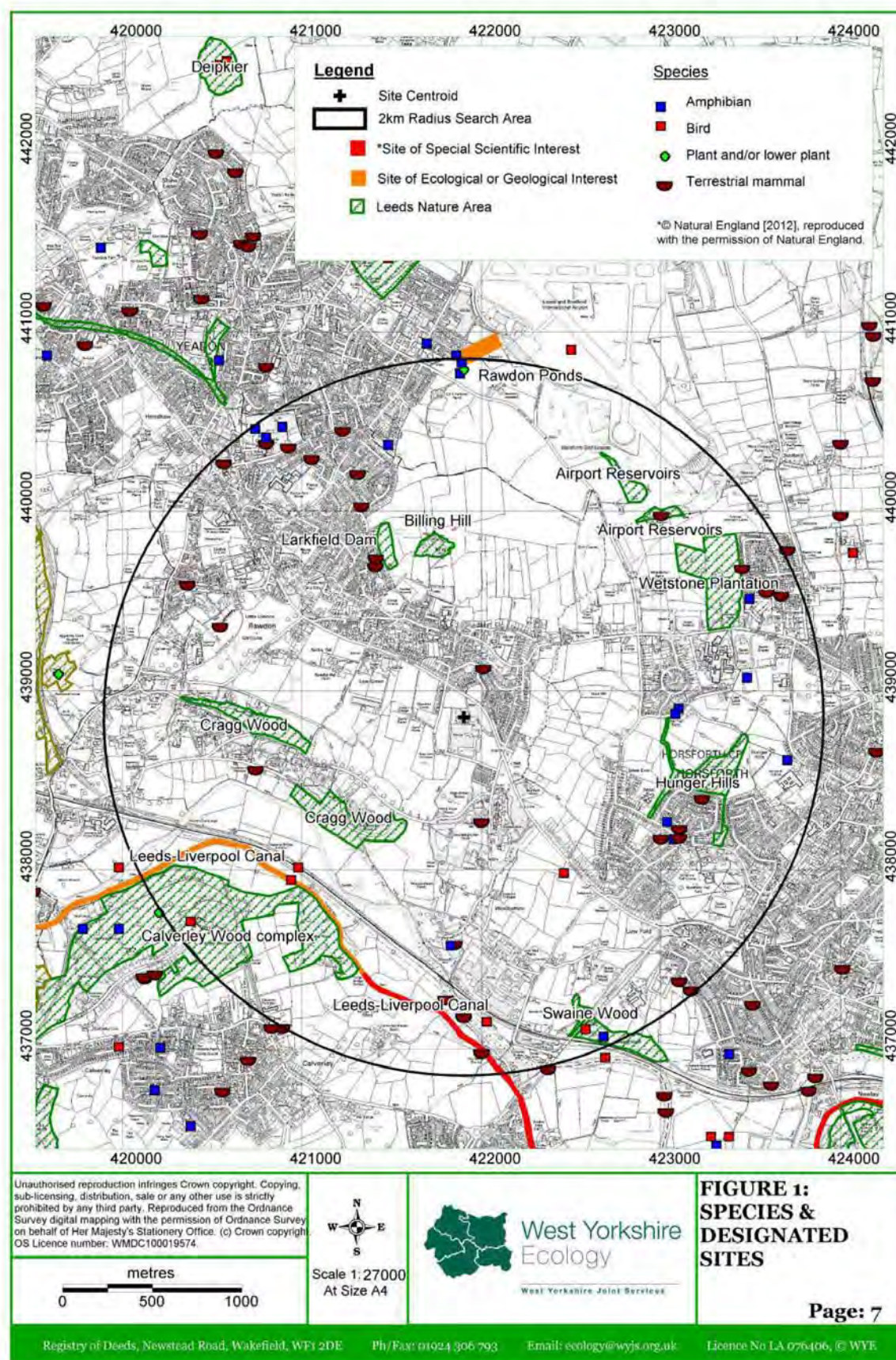
3.1.2 There are no internationally designated sites for nature conservation interest within 5km. However one nationally designated site is located approximately 1.53km to the south of the site, which comprises a section of the Leeds- Liverpool Canal that is designated as a Site of Special Scientific Interest (SSSI) due to the presence of diverse aquatic flora and fauna within the channel, including one nationally scarce pondweed *Potamogeton trichoides*.

Several fish and amphibian species including:

- pike (*Esox lucius*)
- roach (*Rutilus rutilus*)
- common frog (*Rana temporaria*) and
- common toad (*Bufo bufo*) are noted to breed within this section of the canal, and a variety of
- aquatic invertebrates are also present.



## LOCAL WILDLIFE SITES





3.1.3 There are eight local wildlife sites, which are called Local Nature Areas (LNAs) in the Leeds District. These are bullet pointed below, with the full details provided within Appendix 2.

- Cragg Wood (two LNAs) – located 0.6km south-east of the site;
- Billing Hill (LNA) – located 0.73km north of the site;
- Larkfield Dam (LNA) – located 0.76km north of the site;
- Hunger Hills (LNA) – located 1.05km east of the site;
- Calverley Wood Complex (LNA) – located 1.2km south-west of the site;
- Wetstone Plantation (LNA) – located 1.39km north-east of the site;
- Airport Reservoirs (two LNAs) – located 1.43km north-east of the site; and
- Swaine Wood (LNA) – located 1.62km south-east of the site.

### **Protected Sites**

4.2.2 The nearest site of nature conservation interest to the site is Cragg Wood LNA. This is located approximately 0.6km to the south east of the site and was designated as

*“a site of local or district-wide importance for the enjoyment, study or conservation of wildlife, geological features and landforms”*  
(Leeds City Council, 2013a).

Cragg Wood LNA comprises two areas of semi-natural broad-leaved woodland.

### 3.3.1 Sites of Ecological or Geological Importance

Sites of Ecological or Geological Importance’ (SEGI) are areas identified by the relevant local authority as being important for their flora, fauna, geological or physiological features. They are of county wide importance. Sites recorded include:

- Leeds to Liverpool Canal
- Rawdon Ponds

### **Rawdon Ponds**

Rawdon Ponds is one of the most important breeding sites for amphibians in West Yorkshire. Breeding records go back to the 1950's. The ponds also support a good range of aquatic and swamp communities including the regionally rare *Oenanthe fistulosa* and nationally scarce, *Stratiotes aloides*. The grassland provides terrestrial habitat for the amphibians.

## **SPECIES LIST**

### ***Amphibia***

frog *Rana temporaria*

toad *Bufo bufo*

smooth newt *Triturus vulgaris*

palmate newt *Triturus helveticus*

***great crested newt Triturus cristatus***

### ***Odonata***

blue tailed damselfly *Ischnura elegans*

common blue damselfly *Enallagma cyathigerum*

brown hawker *Aeshna grandis*

**Plants**

Achillea millefolium yarrow  
 Achillea ptarmica sneezewort  
 Agrostis capillaris common bent  
 Agrostis stolonifera creeping bent  
 Anthoxanthum odoratum sweet vernal-grass  
 Anthriscus sylvestris cow parsley  
 Calluna vulgaris heather  
 Capsella bursa-pastoris shepherd's-purse  
 Carex binervis green-ribbed sedge  
 Carex nigra common sedge  
 Centaurea nigra common knapweed  
 Chamerion angustifolium rosebay willowherb  
 Cirsium arvense creeping thistle  
 Cirsium vulgare spear thistle  
 Crataegus monogyna hawthorn  
 Dactylis glomerata cock's-foot  
 Deschampsia cespitosa tufted hair-grass  
 Deschampsia flexuosa wavy hair-grass  
 Eleocharis palustris common spike-rush  
 Festuca arundinacea tall fescue  
 Festuca ovina sheep's fescue  
 Festuca rubra red fescue  
 Galium palustre common marsh bedstraw  
 Galium saxatile heath bedstraw  
 Glyceria fluitans floating sweet-grass  
 Glyceria notata plicate sweet-grass  
 Holcus lanatus Yorkshire fog  
 Juncus effusus soft rush  
 Juncus squarrosus heath rush  
 Leontodon autumnalis autumn hawkbit  
 Lolium perenne perennial rye-grass  
 Lotus corniculatus common bird's-foot trefoil  
 Lycopodium europaeus gipsywort  
 Matricaria discoidea pineappleweed  
 Molinea caerulea purple moor-grass  
 Myosotis laxa tufted forget-me-not  
 Myosotis scorpioides water forget-me-not  
 Nardus stricta mat grass  
 Oenanthe fistulosa tubular water-dropwort  
 Plantago lanceolata ribwort plantain  
 Plantago major greater plantain  
 Poa annua annual meadow-grass  
 Polygonum aviculare knotgrass  
 Potamogeton natans broad-leaved pondweed  
 Ranunculus acris meadow buttercup  
 Ranunculus flammula lesser spearwort  
 Ranunculus repens creeping buttercup  
 Rorippa nasturtium-aquaticum watercress  
 Rubus fruticosus bramble  
 Rumex acetosa common sorrel  
 Rumex acetosella sheep's sorrel  
 Rumex obtusifolius broad-leaved dock  
 Senecio jacobaea common ragwort  
 Sparganium erectum branched bur-reed  
 Stratiotes aloides water soldier  
 Taraxacum agg dandelions  
 Trifolium pratense red clover  
 Trifolium repens white clover  
 Urtica dioica nettle

*The Airedale Ecology Report can be supplied to add detail to these extracts – please email us a request.*

## **Rawdon Greenbelt Action Group - Wildlife Sub-Group**

Given the extremely rich and diverse ecology of our village, our group decided to form a sub-group to ensure that we collate all the research we can find to protect the local wildlife, nature, trees, hedregrows, habitats and so on. We are currently working on our own research in and around as much of Ghyll Beck as possible. This is so that it can be made into a **Local Wildlife Site** designated by WYES, who are supporting us in this endeavour and advise us that it has a very good chance of becoming designated. Our key problem thus far is obtaining land-owner permission to survey much of the area – especially those who have submitted land themselves for inclusion in the SAP. So our surveys have been amateur to date until we raise enough capital to commission private consultants to carry out a professional survey. In the meantime therefore, we are submitting the research work we have done to date within this document.

### **Ghyll Beck (Red Beck known by local residents)– Research To Date**

Red Beck is an important site. In terms of size, Red Beck could be designated as ***Guideline Wd1 Ancient semi-natural woodland of 0.5ha or more in size***. For this to be the case, historical map evidence is essential (back to at least 1600). We will continue to research this during the course of the group's project work.

If the Red Beck continues beyond public accessibility (there is a barbed wire fence but the wood does continue well beyond it), then Guideline

***Wd5 - 'Bluebell woodlands greater than 0.5 ha with a NVC random quadrat constancy for bluebell of III or over and a ground cover by bluebells of 40% or greater in at least 10% of the woodland area'*** - would apply. This would make the Bluebell wood a rare and exceptional feature.

The rationale for it being a Wd5: *The UK supports a significant proportion of the European population of bluebell (Hyacinthoides non-scripta) and, as such, has a particular duty to ensure the survival of this species through the protection of bluebell woodland habitat.*





Red Beck also contains a large number of **Veteran Trees**. The Veteran Trees Initiative (VTI) has produced a book regarding all aspects of veteran trees and their management available as pdf here: [http://www.treeworks.co.uk/downloads/SSM\\_HandBook.pdf](http://www.treeworks.co.uk/downloads/SSM_HandBook.pdf)

In this publication a veteran tree is “defined as a tree that is of interest biologically, culturally or aesthetically because of its age, size or condition.”

This includes trees that are in the ancient stage of their life and trees that are old relative to other specimens of the same species.

The VTI indicates that veteran trees are characterised by the presence of features such as:

- large girth for the species concerned,
- major trunk cavities or progressive hollowing,
- naturally forming water pools,
- decay holes,
- physical damage to trunk,
- bark loss,
- large quantity of dead wood in the canopy in damp, shady and dry, open conditions,
- sap runs,
- crevices in the bark, under branches or on the root plate sheltered from direct rainfall,
- fungal fruiting bodies (e.g. from heart rotting species),
- high number of interdependent wildlife species,

Many veteran trees can be found in Red Beck and bordering both **HG3-4** and **HG3-3**.

Red Beck is also an ancient wood. Ancient woods according to the WYES, Local Wildlife Site (LWS) Guidelines, are *‘those which have had a continuous woodland cover since at least 1600 AD and have only been cleared for underwood or timber production. The great majority are believed to be primary, that is they are surviving fragments of primeval forest, the climax vegetation type of much of this country.’*

It notes that in some instances ‘woodlands have developed on land which may have been open ground or farmland before 1600 AD. These are termed ancient secondary woodlands and are difficult to separate from primary woodlands. Both are referred to as “ancient woodland” in the West Yorkshire Inventory of Ancient Woodland (provisional) (Nature Conservancy Council 1988). Ancient woodlands have had a long time to acquire species and form rich communities of plants and animals. Their soils are also important having remained largely undisturbed for centuries.

Red Beck also has a beck or stream and this feeds in to the river. RGAG contacted WYE’s Robert Mashedur with regards to sightings of European Otters in and around the River Aire and sites adjacent to it. We wanted to know if it were possible that otters were using the beck as part of a local network.

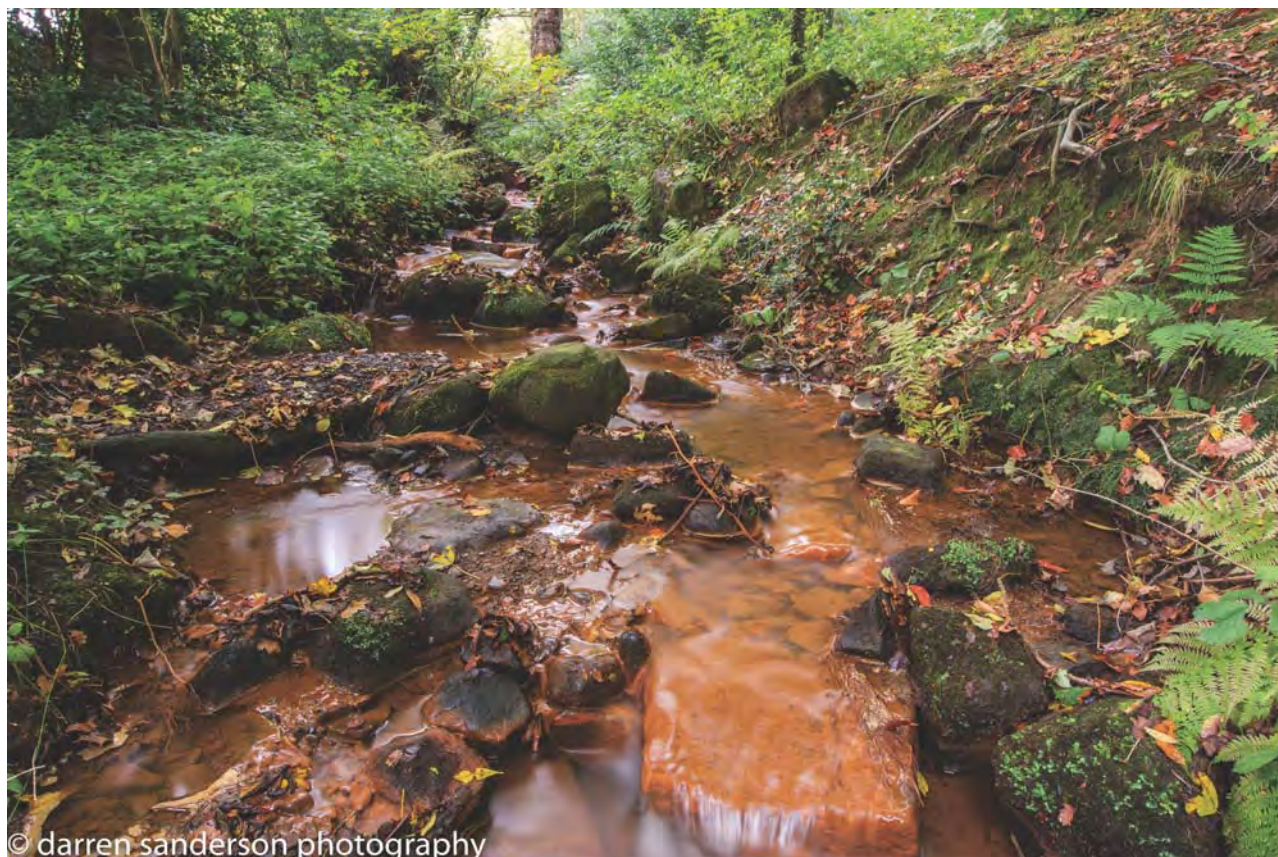
Mashedur replied thusly:

‘I have checked our otter records for the River Aire and Ghyll Beck. The nearest records



we hold are on the River Aire under the railway bridge at SE218373 only 320m from the confluence with the Ghyll Beck. Low Mill straddles the beck and it is not clear whether or not it is likely to prevent otters getting further up-stream.”

It is important to have professional survey work carried out (funds permitting) to determine the extent of otter activity and other attributes pertaining to the important flowing water habitat of Red Beck.



Drawing on the criteria for LWS, Red Beck and **HG3-4 and HG3-3** were surveyed on 3 September 2015.

Criteria/Attributes of LWS relevant to sites **HG3-4 and HG3-3** and Red Beck include:

- Size
- Naturalness
- Rare or Exceptional Features
- Connectivity in the Landscape
- Recorded history and cultural association

It should be noted that the above criteria are not necessarily discreet categories but rather can be dependent on one another. This inter-relationship of criteria is explained in more detail in the West Yorkshire Local Wildlife Selection Criteria document.

### **Sites HG3-4 and HG3-3**

Sites **HG3-4 and HG3-3** could be considered Grassland with limited or no management and includes meadows and pastures.

It may be argued – which is why a professional survey would have been so useful – that both sites constitute Neutral grassland.

The LWS criteria states:

‘Unimproved neutral grassland habitat underwent a major decline in the 20th century. It was estimated in 1994 that less than 15,000ha of species-rich neutral grassland remained within the UK (both upland and lowland). In England there is significantly less than 10,000ha of species rich neutral grassland. This habitat is now in small sites with a fragmented distribution throughout much of the UK.

Neutral grasslands support a high proportion of forbs (broad-leaved herbaceous species) relative to grasses. Characteristic species of this habitat, which are now scarce include pepper saxifrage (*Silaum silaus*), dyer’s greenweed (*Genista tinctoria*), and adder’s tongue fern (*Ophioglossum vulgatum*).

Commoner characteristic species include meadow crane’s-bill (*Geranium pratense*), yellow rattle (*Rhinanthus minor*), pignut (*Conopodium majus*) and red clover (*Trifolium pratense*).

On the day of the survey, no scarce species were observed on either of the allocated sites, but Red Clover and Pignut were observed.

Adjacent to both potential development sites in this location, Red Beck appears to satisfy at least TWO of the LWS habitat types. It is an ancient woodland AND contains flowing water.



**RESIDENTS’ SIGHTINGS submitted to RGAG** *for the purposes of this report (short notice given)*

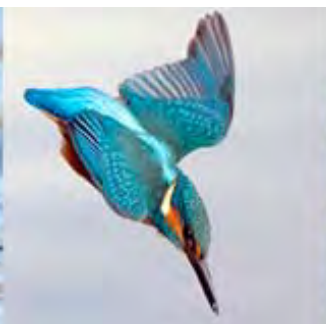
***Table of Wildlife Sightings Reported by Residents Local to the Sites designated for Development.***

To follow is a table of just a few sightings submitted to the Group for this report.



| Respondent                | Date                                   | Location   | Wildlife   |
|---------------------------|--|--|--|
| Sue Dunn<br>(no pics)     | -                                      | New York Lane  | Weasels<br>Greater Spotted<br>Woodpeckers<br>Annual frog<br>crossing point<br>Red Kite<br>Bats   |
| Glen Conybeare<br>(pics)  | February 2015                          | Snaith Wood<br>Drive                                     | Roe Deer   |
| Sue Dunn<br>(no pics)     | -                                      | Woodlands<br>Drive                                       | Little Owls<br>Badgers<br>Barn Owls  |
| Sue Hydes<br>(pics)       | -                                      | River Aire<br>parallel to<br>Underwood<br>Drive          | Otters   |
| Michelle Parker<br>(pics) | frequent                               | Cragg Wood<br>Road                                       | Roe Deer<br>Fox<br>Badger  |
| Glen Conybeare            | 5 October 2015                         | Knott Lane/<br>Woodlands<br>Drive                        | Roe Deer   |
| Joanne Gabriel            | Regularly in<br>garden                 | Southlands<br>Avenue                                     | Roe Deer<br>Little Owl<br>Weasel<br>Stoat<br>Shrew<br>Tree creeper<br>Great Spotted<br>Woodpecker<br>Green<br>Woodpecker<br>Fox<br>Jay<br>Field mouse<br>Fieldfare<br>Red Kite<br>Tawny Owl<br>Grey Heron<br>Bats – lots |
| Spandler Family           | Regularly in<br>garden and on<br>walks | Woodlands<br>Drive,<br>Southlands<br>Avenue, Red<br>Beck | Roe Deer<br>Otter<br>Brown Trout (Aire)<br>Great Spotted<br>Woodpecker<br>Bats<br>Jay<br>Field Mouse<br>Doormouse<br>Shrew & Vole<br>Fieldfare<br>Treecreeper<br>Red Kite<br>Tawny Owl<br>Kingfisher                     |

|   |                          |  |  |
|---|--------------------------|--|--|
| Martin Fincham<br>amateur wildlife enthusiast | During residence in area | Woodlands Drive, Southlands Avenue, Cragg Wood | <p><b><u>Mammals</u></b><br/> Fox (<i>Vulpes vulpes</i>)<br/> Stoat (<i>Mustela erminea</i>)<br/> Weasel (<i>Mustela nivalis</i>)<br/> Roe Deer (<i>Capreolus capreolus</i>)<br/> Common Shrew (<i>Sorex araneus</i>)<br/> Pipistrelle Bat (<i>Pipistrellus pipistrellus</i>)<br/> Hedgehog (<i>Erinaceus europaeus</i>)</p> <p><b><u>Reptiles &amp; Amphibians</u></b><br/> Palmate Newt (<i>Lissotriton helveticus</i>)<br/> Common Frog (<i>Rana temporaria</i>)<br/> Common Toad (<i>Bufo bufo</i>)</p> <p><b><u>Insects &amp; Butterflies</u></b><br/> Gatekeeper butterfly (<i>Pyronia tithonus</i>)<br/> Small Tortoiseshell (<i>Aglais urticae</i>)<br/> Peacock (<i>Aglais io</i>)<br/> Red Admiral (<i>Vanessa atalanta</i>)</p> <p><b><u>Birds</u></b><br/> Jay (<i>Garrulus glandarius</i>)<br/> Siskin (<i>Carduelis spinus</i>)<br/> Bullfinch (<i>Pyrrhula pyrrhula</i>)<br/> Goldfinch (<i>Carduelis carduelis</i>)<br/> Greenfinch (<i>Carduelis chloris</i>)<br/> Long Tailed Tit (<i>Aegithalos caudatus</i>)<br/> Treecreeper (<i>Certhia familiaris</i>)<br/> Nuthatch (<i>Sitta europaea</i>)<br/> Lesser Spotted Woodpecker (<i>Dendrocopos minor</i>)<br/> Greater Spotted Woodpecker (<i>Dendrocopos major</i>)<br/> Sparrowhawk (<i>Accipiter nisus</i>)<br/> Red Kite (<i>Milvus milvus</i>)<br/> Grey Heron (<i>Ardea cinerea</i>)<br/> Tawny Owl (<i>Strix aluco</i>)<br/> Chaffinch (<i>Fringilla coelebs</i>)<br/> Fieldfare (<i>Turdus pilaris</i>)<br/> Redwing (<i>Turdus iliacus</i>)<br/> Barn Swallow (<i>Hirundo rustica</i>)<br/> Swift (<i>Apus apus</i>)<br/> House Martin (<i>Delichon urbica</i>)<br/> Not to mention...<br/> House Sparrow, Dunnock, Blue Tit, Coal Tit, Great Tit, Wren, Blackbird, Robin, Song Thrush, Mistle Thrush, Wren, Jackdaw, Magpie, Mallard, Carrion Crow, Collared Dove, Wood Pigeon</p> |
|---|--------------------------|--|--|





**RECENT DISCOVERY!****Palmate Newt** (*Lissotriton helveticus*)

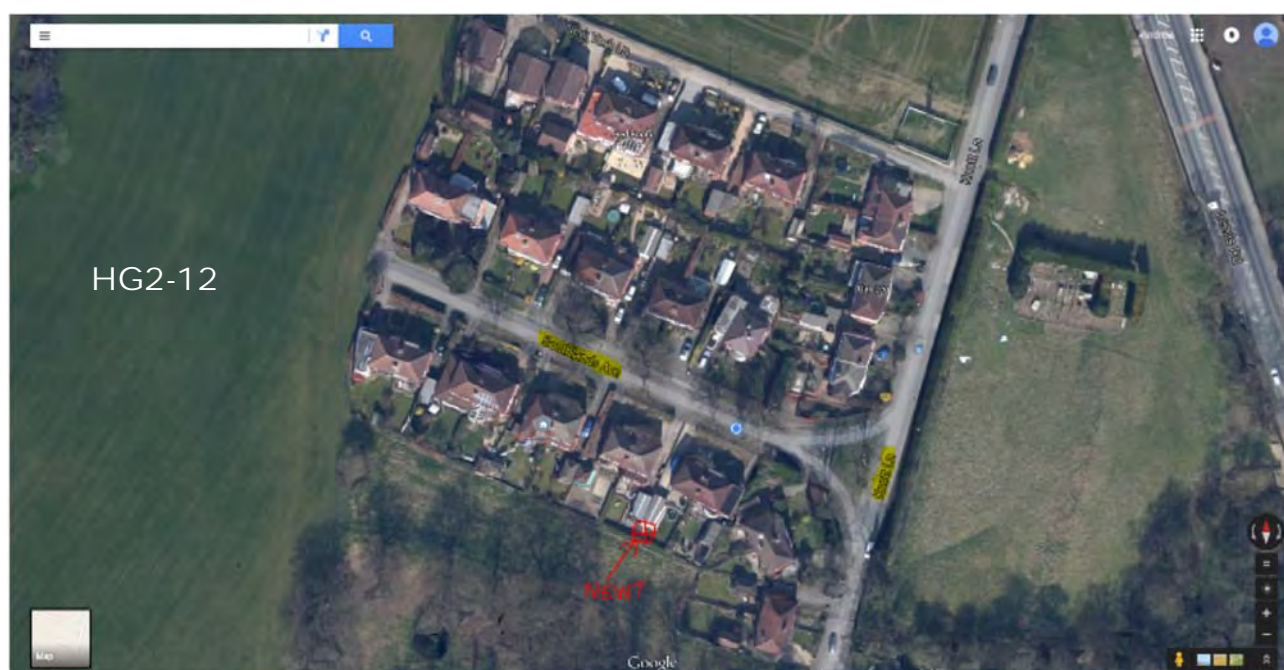
Andrew Saville - 3 Southlands Avenue, Rawdon, Leeds, LS19 6JN

**Directly next to the Site allocated by the Council for housing known as HG2-12**

Last weekend (23-08-15) whilst clearing some wet leaves and rotten wood from the bottom of my garden to make way for a new fence, I found a newt within the wet leaves.

The newt was found in the back garden of 3 Southlands Avenue, Rawdon, Leeds, LS19 6JN, close to the boundary with the neighbouring farmers field. Please see below a map showing the location.

This is now confirmed to be a Palmate Newt and was formally recorded with West Yorkshire Ecology Services on 28 August 2015.



## **Ornithology**

Rawdon is with a natural green corridor, from Leeds out towards the Dales. It is next to the River Aire, it is riddled with Becks and ancient woodland, providing a myriad of habitats, feeding and resting ground for migratory birds.

Darren Shepherd is a qualified Ornithologist and has worked for the RSPB. He lives in Aireborough all his life and his love of ornithology was as a direct result of living here and being able to easily study local activity.

He contacted our campaign group, eager to join and share his knowledge in 2012. Since then he has actively watched and recorded bird life in and around Rawdon and Aireborough.

Recently we decided to ask one of our campaign group members who is a designer to create a poster featuring some of Darren's more interesting or rare discoveries. It is entitled:

**Birds of Rawdon and Horsforth seen, heard and studied on the greenbelt expanses, the woodland, the River Aire and on The Billing.**



# BIRDS



of Rawdon and Horsforth seen, heard & studied on the greenbelt expanses, the woodland, the River Aire and on The Billing.

"I cannot overstate how essential Aireborough is to Yorkshire's avian population - it is a distinct Green Corridor from Leeds to the Dales, home to several *Schedule One* breeding species, including Curlew and Lapwing in particular."

## Spring and Summer

Warblers

Common Whitethroat

*A Speciality For The Billing Area*

Chiff Chaff

Willow Warbler

Blackcap

Garden Warbler

Lesser Whitethroat

*Passage Migrant*

Yellow Hammer

Skylark

Curlew

Lapwing

House Sparrow

Blackbird

Mistle Thrush

Song Thrush - *frequent*

Greater Spotted Woodpecker

Lesser Spotted Woodpecker

Nuthatch

Goldfinch

Greenfinch

Cuckoo

Swallow

Swift

House Martin

Jay

Wren

Robin

Dunnock

Heron

Mallard

Blue Tit

Coal Tit

Small Tit

Long-Tailed Tit



## River Aire

Kingfisher

Sedge Warbler

Willow Warbler

Reed Bunting

Goosander

Mallard

Tufted Duck

Moorhen

Canada Goose

Greylag Goose

Heron

Dipper

Cormorant

Teal

Gadwall

Sand Martin

Pied Wagtail

Grey Wagtail

Yellow Wagtail



## Winter Visitors

*These visit mainly from Scandinavia*

Redwing

Fieldfare

Meadow Pipit

Golden Plover

## Raptors Include:

Kestrel

Sparrowhawk

Red Kite

Common Buzzard

Hobby

Honey Buzzard - **very rare**

## Owls Include:

Tawny

Barn

Short Eared - **rare**

Little Owl

*Special report for RGAG by*

**Darren Shepherd**

**Ornithologist**

BTO Approved Qualification in

Western Palearctic Bird ID and Sound

Nord-Trondelag University College, Denmark

Darren has worked for the RSPB and is a voluntary Warden at RSPB Nature reserve St Aidan's, near Castleford, Leeds.

He has lived in Aireborough all his life and is a passionate advocate for greenbelt and preserving these local, vital habitats





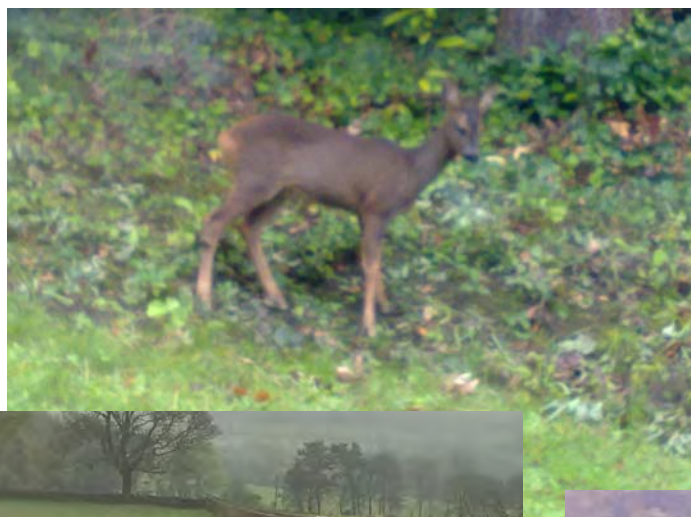
## **Roe Deer**

Rawdon is very proud indeed of it's Bevy of Roe Deer (we don't know how many there are). Anyone living near all the Rawdon sites which LCC have put in their Site Allocation Plan will know very well the delight of suddenly spotting deer grazing in the fields or woodland. It is rare to be ready to capture them on camera though. The slightest noise or movement can disturb them and, suddenly, they are gone! However, we have managed to gather up a few sightings captured luckily in time to show that, yes, they really do live in our peaceful community.

Rawdon residents treasure the deer, and are passionate about ensuring that they continue to enjoy the peaceful setting of the local greenbelt expanses. The area includes Cragg Wood Conservation Area, its two designated wildlife sites, it is within LCC's Special Landscape Area, Leeds Country Way, the Area of Green Infrastructure, the ancient woodlands and hedgerows, the grasslands, West Leeds Country Park, the Aire Valley, Rawdon Billing Hill, the pastureland and fields which contribute so importantly to the rich biodiversity of our local ecosystem, and which defines the distinct semi-rural character of Rawdon.



**HG2-12**



**HG3-4**

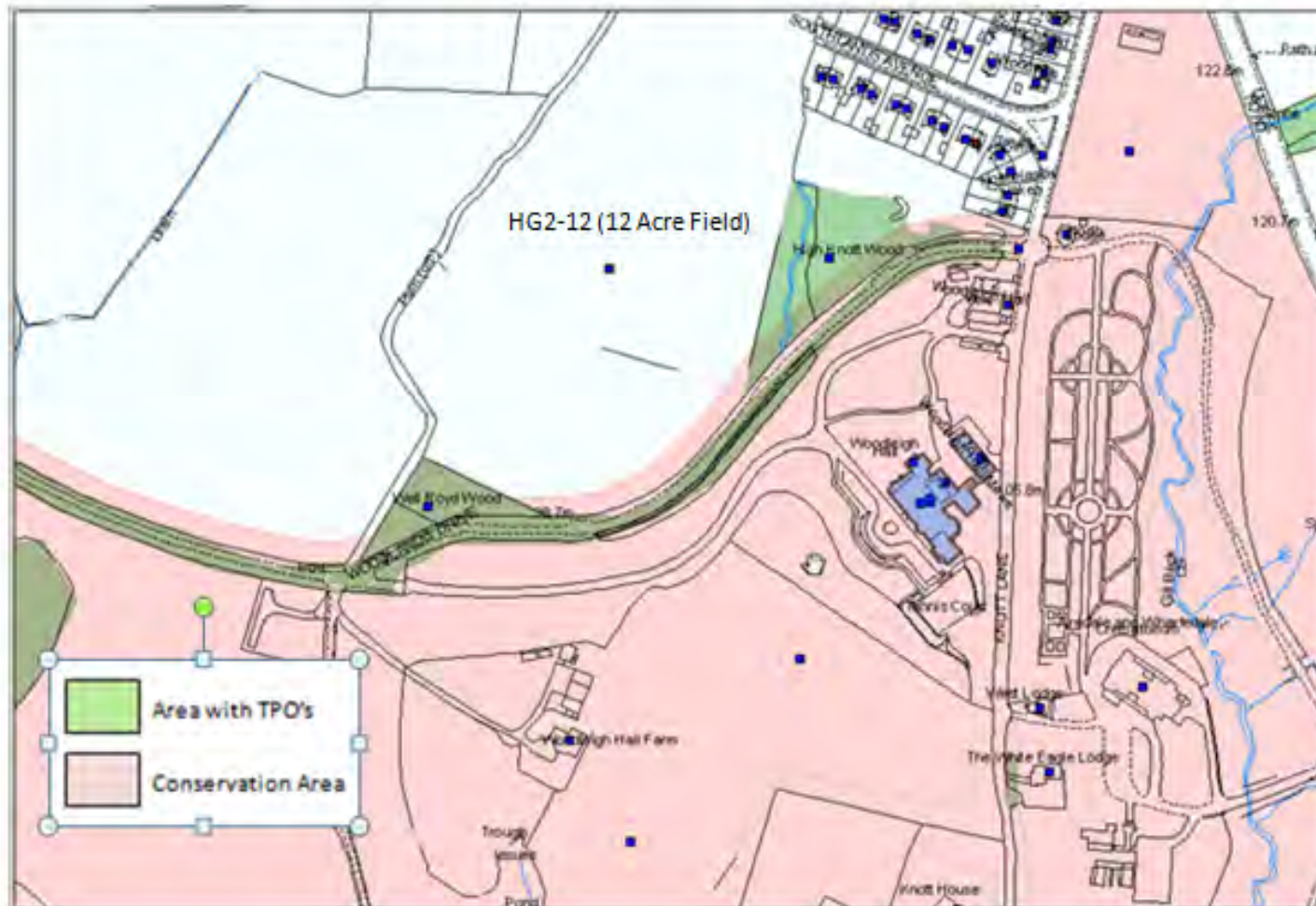
# TREE SURVEY



**HG2-12 (12 ACRE FIELD) &  
SOUTHLANDS AVENUE  
Sept-Oct 2015**



## Trees in HG2-12 (12 Acre Field) covered by TPOs Well Royd Wood and High Knott Wood



Map of Tree Preservation Orders provided by Leeds City Council Development Enquiry Centre, Planning Services.



# HG2-12 (12 ACRE FIELD) TREE SURVEY



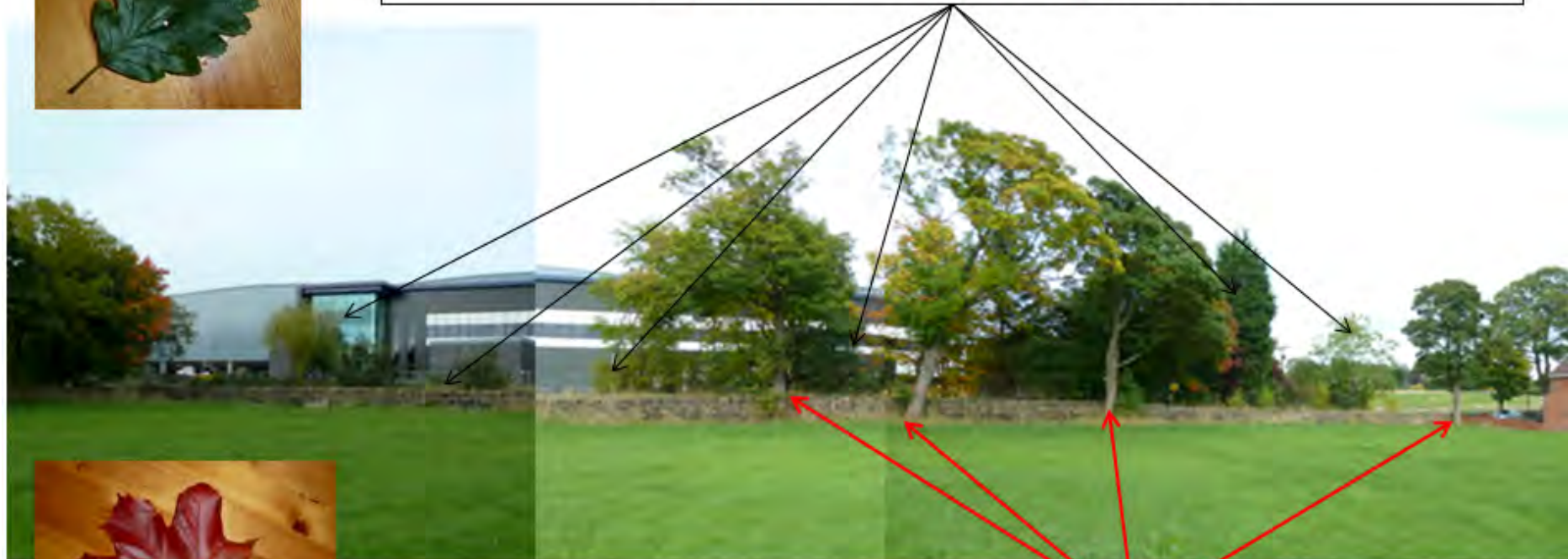
**North – New York Lane**  
**West – Leeds Country Way Footpath**

## Trees along north side of HG2-12 (12 Acre Field) and New York Lane

Whitebeam



Mixed group of Birch, Whitebeam, Maple, Hawthorn, Lime, Elder, Leylandii, Osier and Holly on Airedale land to north of New York Lane



Maple

4 Sycamore in 12-Acre Field (North)

Photo taken 10-Oct-15 ; Survey 18-Oct-15



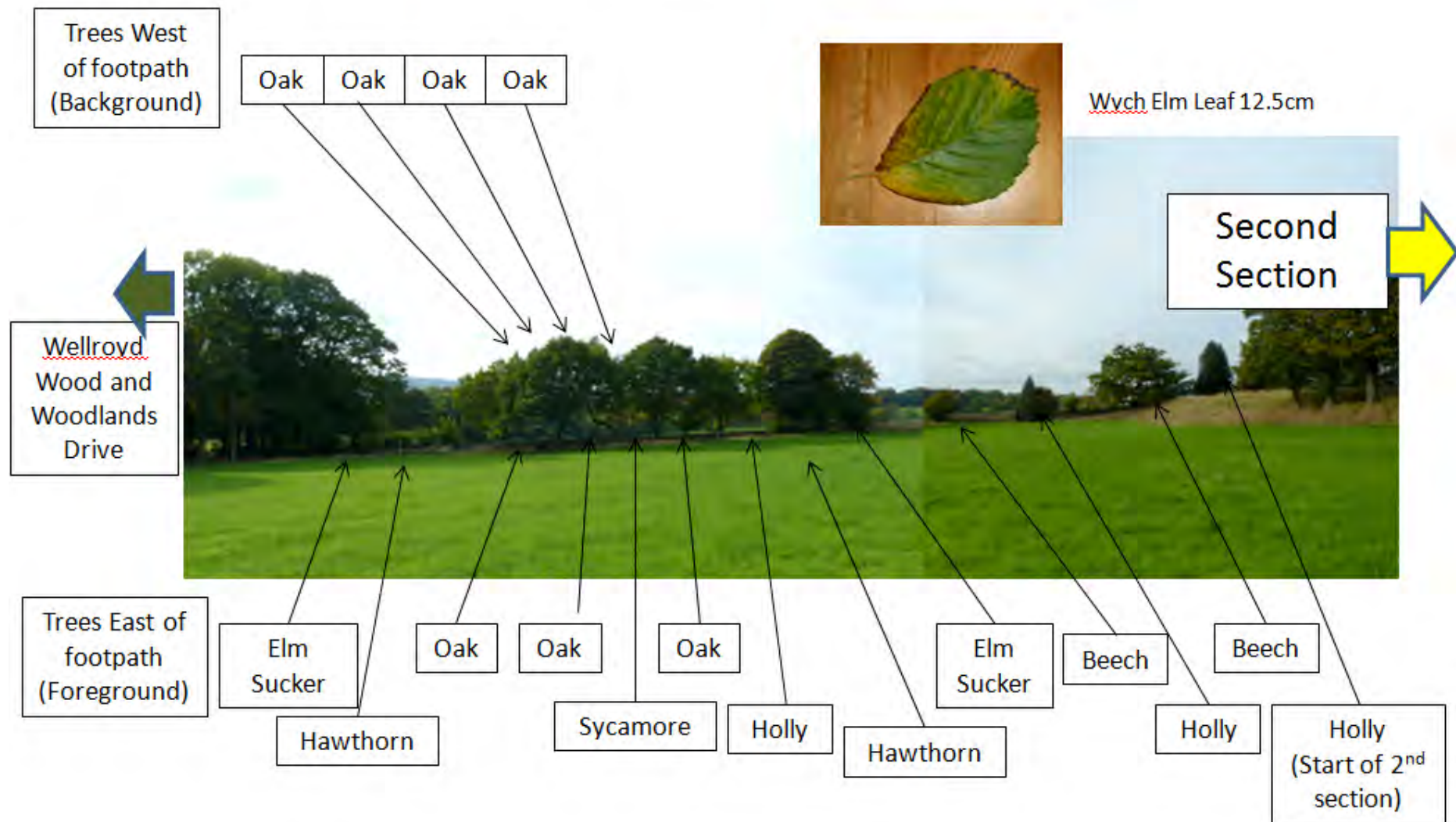
## Trees along north side of HG2-12 (12 Acre Field) and New York Lane



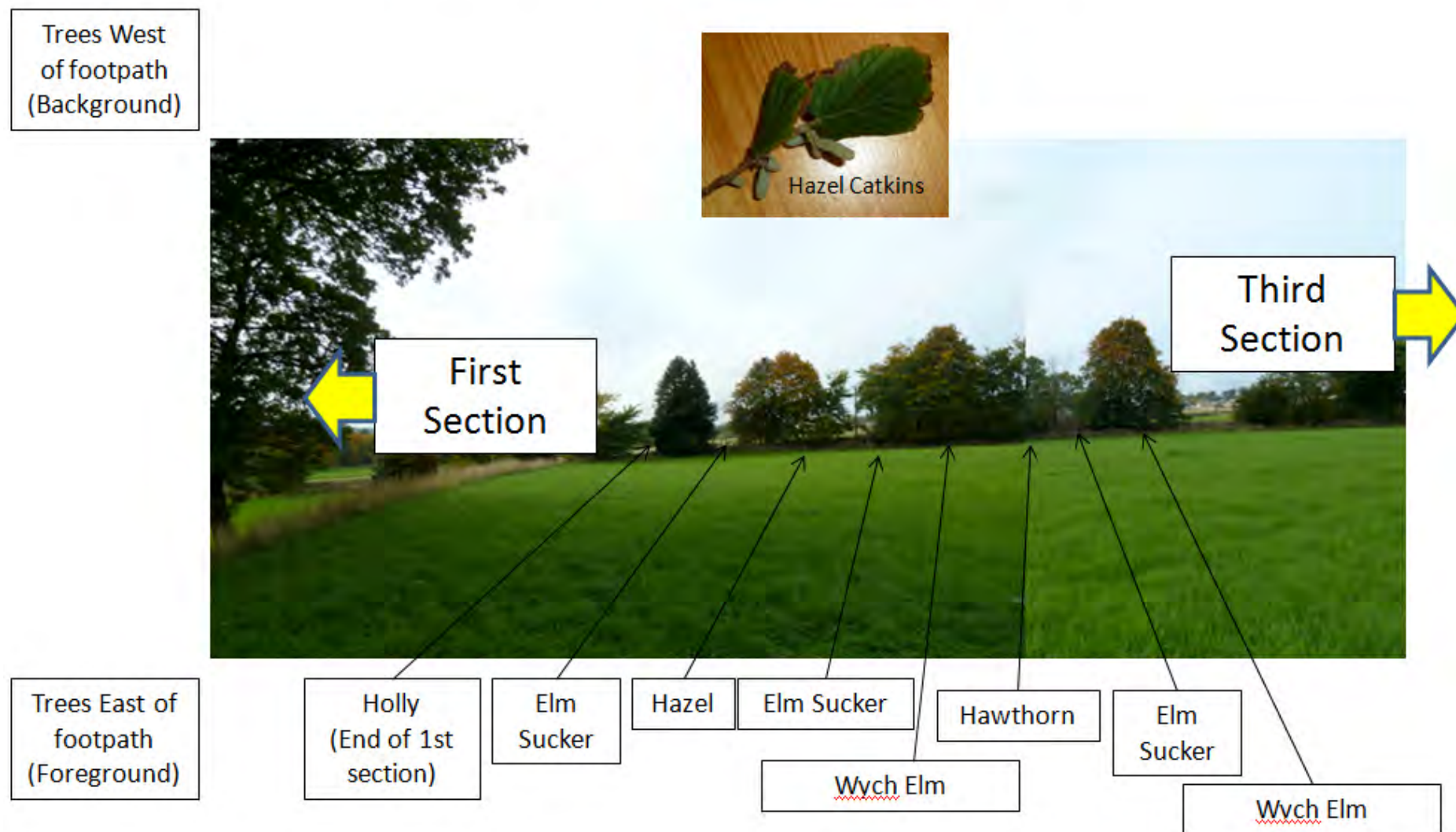
| Description | Grid Reference | Address (near)        | Species  |
|-------------|----------------|-----------------------|----------|
| Point A     | SE 21921 38616 | New York Lane, Rawdon | Sycamore |
| Point B     | SE 21928 38613 | New York Lane, Rawdon | Sycamore |
| Point C     | SE 21936 38610 | New York Lane, Rawdon | Sycamore |
| Point D     | SE 21971 38601 | New York Lane, Rawdon | Sycamore |



## Trees along west side of HG2-12 (12 Acre Field) and Leeds Country Way Footpath First Section from Woodlands Drive (South)

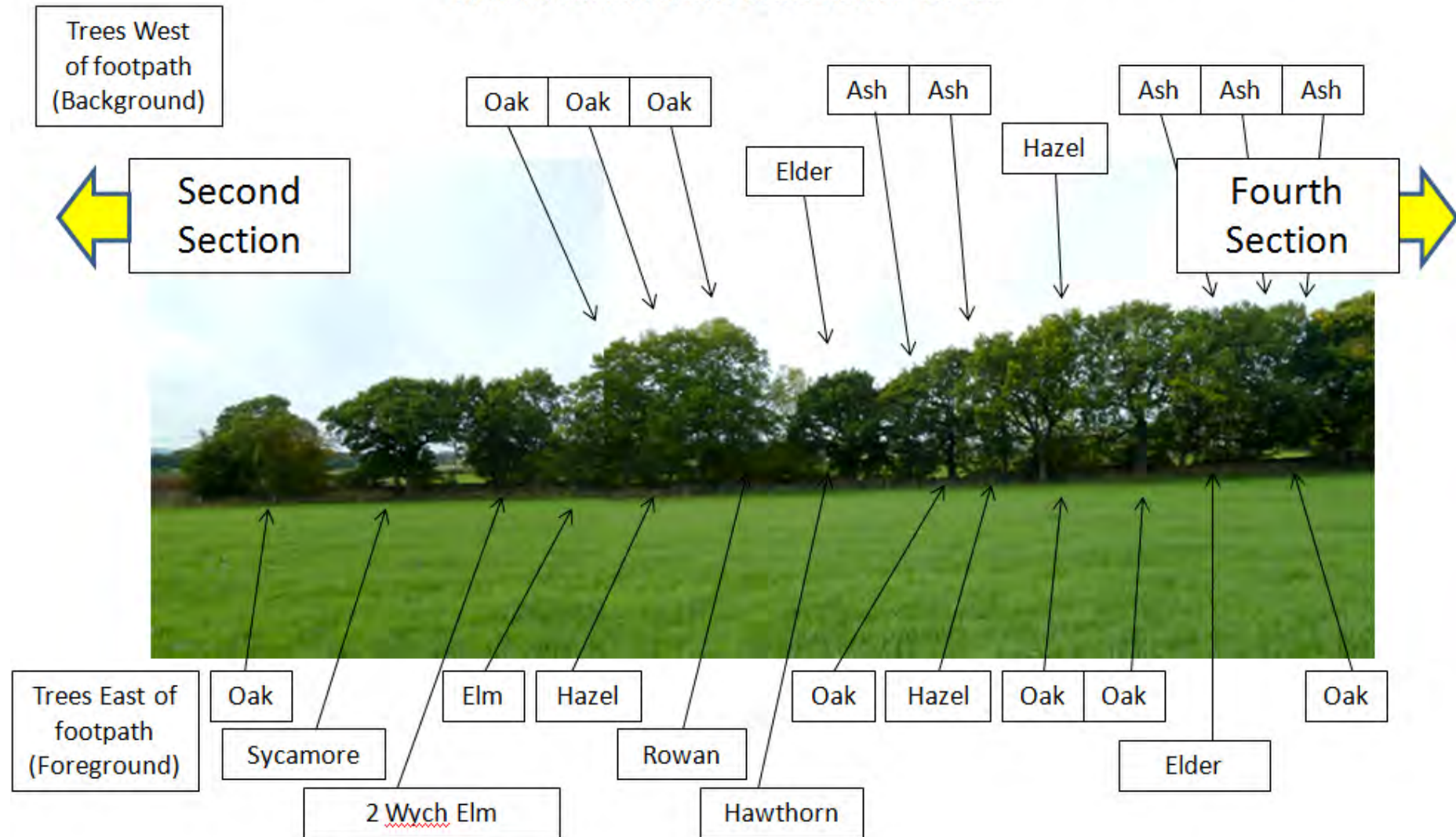


## Trees along west side of HG2-12 (12 Acre Field) and Leeds Country Way Footpath Second Section from Woodlands Drive



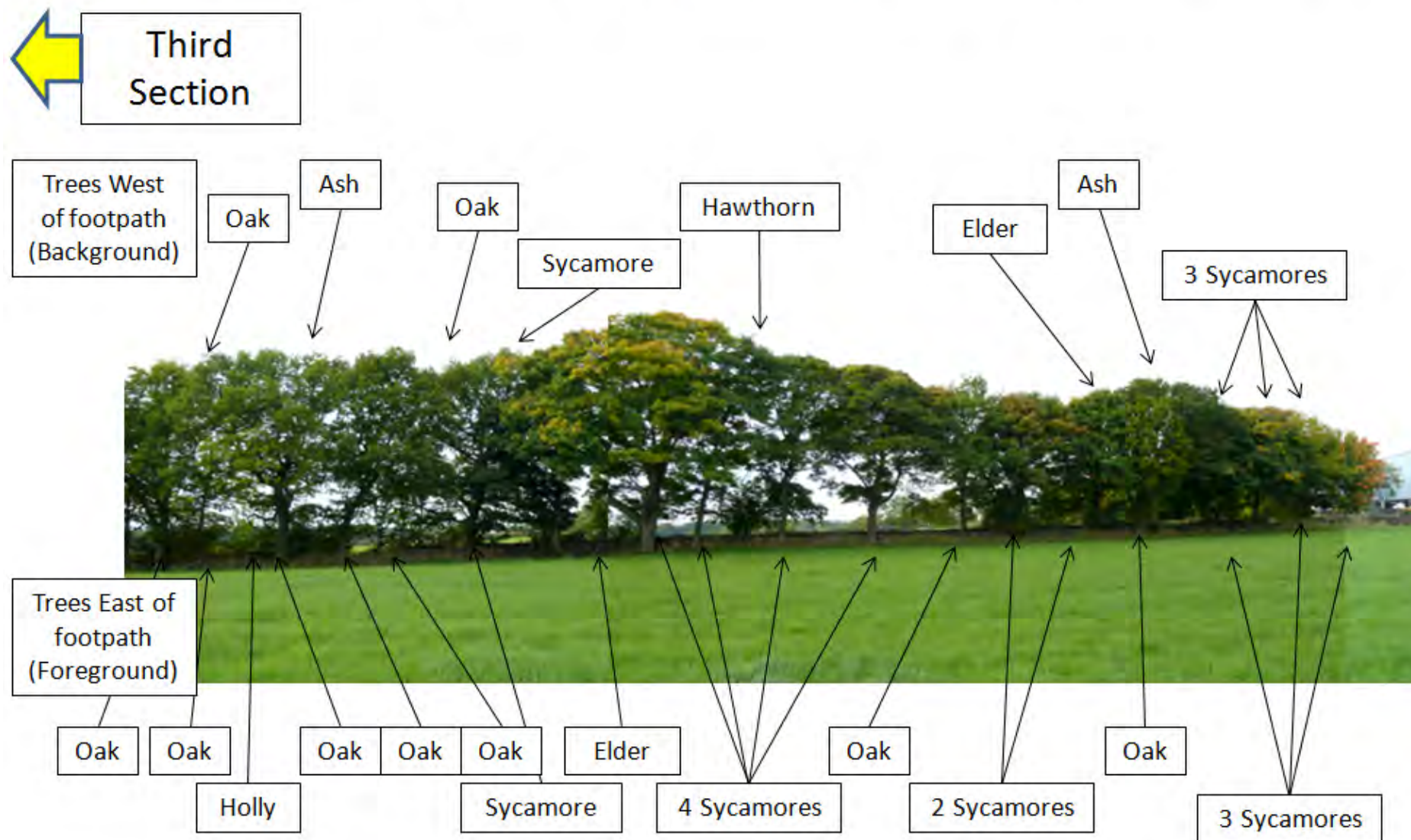


## Trees along west side of HG2-12 (12 Acre Field) and Leeds Country Way Footpath Third Section from Woodlands Drive

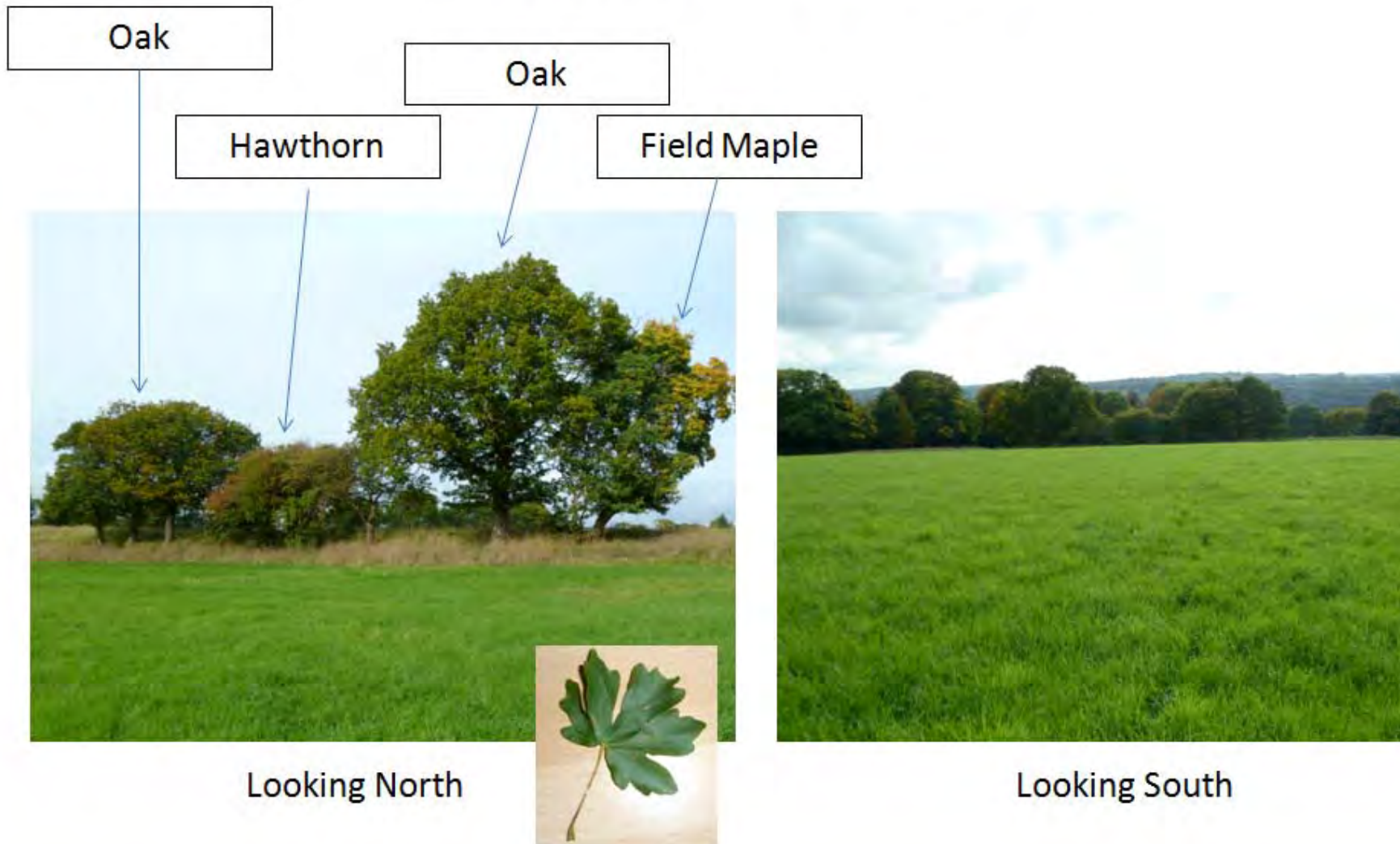




## Trees along west side of HG2-12 (12 Acre Field) and Leeds Country Way Footpath Fourth Section from Woodlands Drive to NY Lane



## Trees in the middle of HG2-12 (12 Acre Field)





# The Trees on Southlands Avenue





| Description | Grid Reference | Address (near)              | Species             | Circumference<br>in cm @ 1.5 M<br>(DBH) | Approx Age | Tree<br>Growth<br>Rate Factor |
|-------------|----------------|-----------------------------|---------------------|---|------------|-------------------------------|
| Point A     | SE 21977 38521 | 15 Southlands Ave, LS19 6JN | Copper Norway Maple | 150                                     |            |                               |
| Point B     | SE 21995 38513 | 11 Southlands Ave, LS19 6JN | Beech               | 217                                     | 85         | 2.55                          |
| Point C     | SE 22012 38505 | 7 Southlands Ave, LS19 6JN  | Beech               | 230                                     | 85         | 2.71                          |
| Point D     | SE 22029 38499 | 3 Southlands Ave, LS19 6JN  | Beech               | 221                                     | 85         | 2.60                          |
| Point E     | SE 22038 38493 | 1 Southlands Ave, LS19 6JN  | Silver Birch        | 145                                     |            |                               |
| Point F     | SE 22057 38484 | Trees Holme, LS19 6JN       | Beech               | 239                                     | 85         | 2.81                          |
| Point G     | SE 22066 38486 | Triangle, LS19 6JN          | Ash                 | 261                                     |            |                               |
| Point H     | SE 22068 38492 | Triangle, LS19 6JN          | Sycamore            | 208                                     |            |                               |
| Point I     | SE 22041 38501 | 2 Southlands Ave, LS19 6JN  | Beech               | 237                                     | 85         | 2.79                          |
| Point J     | SE 22014 38513 | 6 Southlands Ave, LS19 6JN  | Beech               | 235                                     | 85         | 2.76                          |
| Point K     | SE 21996 38522 | 10 Southlands Ave, LS19 6JN | Beech               | 267                                     | 85         | 3.14                          |

Assumed the Beech Trees were planted as 5 year old saplings when the houses on Southlands Ave were built in 1935  
Beech average growth rate factor above is 2.77 which compares to 2.5 in Oare Gunpowder Works Wildlife Activity Sheet.



ENDS

## Chapter 6

# HIGHWAYS AND TRANSPORT

**Please see the independent report completed by Wright Engineering, together with the following.**

### Roads

Rawdon residents rely heavily on car usage, with a congested A65 and no rail link (nearest Rail is Horsforth). Statistics show that the majority of residents use a car to get to work<sup>1</sup>.

| Variable  | Measure | Leeds 027D | Leeds (Metropolitan District) | Yorkshire and The Humber | England    |
|---|---------|------------|-------------------------------|--------------------------|------------|
| All Usual Residents Aged 16 to 74 (Persons) <sup>1</sup>    | Count   | 990        | 560,849                       | 3,875,219                | 38,881,374 |
| Work Mainly at or From Home (Persons) <sup>1</sup>          | Count   | 65         | 14,666                        | 110,962                  | 1,349,568  |
| Underground, Metro, Light Rail, Tram (Persons) <sup>1</sup> | Count   | 1          | 479                           | 10,716                   | 1,027,625  |
| Train (Persons) <sup>1</sup>                                | Count   | 26         | 11,751                        | 58,307                   | 1,343,684  |
| Bus, Minibus or Coach (Persons) <sup>1</sup>                | Count   | 43         | 50,541                        | 207,114                  | 1,886,539  |
| Taxi (Persons) <sup>1</sup>                                 | Count   | 0          | 3,174                         | 16,432                   | 131,465    |
| Motorcycle, Scooter or Moped (Persons) <sup>1</sup>         | Count   | 1          | 1,779                         | 16,173                   | 206,550    |
| Driving a Car or Van (Persons) <sup>1</sup>                 | Count   | 495        | 201,221                       | 1,490,020                | 14,345,882 |
| Passenger in a Car or Van (Persons) <sup>1</sup>            | Count   | 19         | 21,569                        | 155,856                  | 1,264,553  |
| Bicycle (Persons) <sup>1</sup>                              | Count   | 7          | 6,352                         | 62,119                   | 742,675    |
| On Foot (Persons) <sup>1</sup>                              | Count   | 25         | 42,064                        | 285,542                  | 2,701,453  |
| Other Method of Travel to Work (Persons) <sup>1</sup>       | Count   | 2          | 1,629                         | 14,833                   | 162,727    |
| Not in Employment (Persons) <sup>1</sup>                    | Count   | 306        | 205,624                       | 1,447,145                | 13,718,653 |

Building further houses on any of the Rawdon sites: HG2-12, HG3-3, HG3-2, HG3-4, HG2-41 can only add to the congestion on local roads. Assuming 2 cars per household as statistics show for Rawdon<sup>1</sup> this could bring at least an extra 2300 cars onto the road in this already heavily congested area.

| Variable  | Measure | Leeds 027D | Leeds (Metropolitan District) | Yorkshire and The Humber | England    |
|---|---------|------------|-------------------------------|--------------------------|------------|
| All Households (Households) <sup>1</sup>                      | Count   | 556        | 320,596                       | 2,224,059                | 22,063,368 |
| No Cars or Vans in Household (Households) <sup>1</sup>        | Count   | 37         | 102,787                       | 612,903                  | 5,691,251  |
| 1 Car or Van in Household (Households) <sup>1</sup>           | Count   | 205        | 133,414                       | 954,222                  | 9,301,776  |
| 2 Cars or Vans in Household (Households) <sup>1</sup>         | Count   | 241        | 68,943                        | 521,858                  | 5,441,593  |
| 3 Cars or Vans in Household (Households) <sup>1</sup>         | Count   | 55         | 11,751                        | 102,611                  | 1,203,865  |
| 4 or More Cars or Vans in Household (Households) <sup>1</sup> | Count   | 18         | 3,701                         | 32,465                   | 424,883    |
| All Cars or Vans in Area (Vehicles) <sup>1</sup>              | Count   | 937        | 323,030                       | 2,451,298                | 25,696,833 |

<sup>1</sup> Statistics.gov.uk



“Improvements” made by Redrow homes for the new housing development at Clariant called ‘Horsforth Vale’ at the Horsforth roundabout have actually made the traffic worse for Rawdon residents, with journey times either into Rawdon from the North or from Leeds much longer. The changes made there took absolutely NO ACCOUNT of the heavy congestion which bottlenecks daily, even out of rush hour. On a typical day, between 7.15am and 9.30am+ and 3pm and 6.30pm+ traffic is at a standstill from Over Lane in Rawdon right through to the Horsforth roundabout, or crawling along at snail’s pace.

Traffic “rat-running” through the upper part of Rawdon and Horsforth has dramatically increased since the roundabout “improvements”. The Village Town Street is particularly dangerous and congested, because parking is virtually impossible, it is a narrow road and a Primary School is located directly on the side of the Street. Comments from residents:

*“Carr Lane and Layton Lane already suffer from A65 traffic cutting up along. Also the damage sustained by the dry-stone walls that line this section of road...about a year ago a section just along from our house completely caved-in due to increasing volume of traffic, particularly from HGVs.”*

*“Rat run - awful on Town Street at the moment. Alterations to Horsforth roundabout seem to have made things worse. Traffic this am going up Carr Lane at school starting time, creating a real hazard for children walking to school. I know lots of commuters who said it’s added about half an hour at least to their journey to work”*







Traffic also backs up on the ring road leading to the roundabout as well as from Leeds City Centre.

Cllr Richard Lewis speaking on Look North on 4<sup>th</sup> October 2015

***“Everybody who knows the A65 knows how congested it is”***

## Parking

Parking in the area of HG2-12, HG3-3 and HG3-4 is an issue. Overspill parking from housing already on New York Lane, Knott Lane and Southlands Avenue happens on Knott Lane, as this is the only place to put extra cars or visitors. The lack of parking in Rawdon causes cumulative issues throughout the village, with the recent arrival of the large business ‘EMIS’ causing particular problems, being based at the roundabout junction A65 and Apperley Lane, which leads directly to the new Apperley Bridge railway station,



already causing major problems due to congested housing development on the borders between Rawdon and Greengates. This stands to become far more problematic once the station opens, given that it only has car parking for 300 cars, and housing developments planned for that NE Bradford area number some 4,300 new dwellings.



Crematorium cars also use Knott Lane as an overspill car park. Residents from Woodlands Drive also use Knott Lane to park when using the bus service from the A65.

Knott Lane is used as the exit road from the Crematorium and congestion with only one way traffic (because of the parked cars) is inevitable.



Extra cars on this narrow and busy stretch of road from extra houses from **HG2-12, HG3-3 and HG3-4** will not work. The junction at the A65 with Knott Lane is notorious for accidents and near misses, especially due to cars having to negotiate the parked cars.

### Access to Alternative Transport

The bottom of site **HG2-12**, is at least 600metres from the A65 bus stops, but has an elevation rise of 40metres. Access up to the A65 is made difficult due to this. There is an elevation rise of 150 metres to the nearest primary school and a distance of 1600 metres. Accessing both public transport and local facilities would be very difficult for these sites.

Access to a train station – Horsforth is 3500 metres from the bottom of site **HG2-12**. A bus service runs every hour along Layton Road/Brownberrie Lane, but requires a 1300 metre walk up an elevation of 140 metres. A new Railway station is due to open at Apperley Bridge, the bordering settlement to Rawdon in Bradford. This development provides parking for 300 cars, however, given that 4,300 new dwellings are earmarked for building in the immediate area of North East Bradford it is unlikely that this will relieve parking, simply exacerbate traffic congestion beyond the existing problems it causes.



Apperley Bridge, Bradford - 9.15am morning weekly traffic –  
**Not far to the left is the border with Rawdon and a few hundred metres on Nether Yeadon Gill Lane site HG2-10 - allocated for 155 houses.**  
**All around the immediate vicinity of this photograph are hundreds of new houses being built, or due to be built soon in this corner of NE Bradford.**



## **Airport Link Road**

Whilst this 'idea' is not included in the Site Allocation Plan (why not?) special mention must be made of the proposed airport link road, due for public consultation soon.

All 3 options for the road are located in Rawdon or on the border with Horsforth border, yet no appraisal has been done for the three options, and there are NO OTHER OPTIONS *elsewhere* in Leeds, nor is there a proposal for a rail link or tunnel.

If two of the three options were to go ahead, they would – far from relieving congestion on the A65 – make it impossibly worse! The start of the road is OPPOSITE the Crematorium entrance, and cuts up through agricultural land on the boundary between Rawdon and Horsforth. Not only would this cause the merger of two settlements and urban sprawl, it would cause unprecedented traffic to be fed on to the A65 at the single worst point on the whole road. The heavy congestion created on the A65 is NOT - absolutely NOT destined to or from the airport. It is commuter traffic which is going to and from Leeds City centre.

RGAG and the Rawdon Parish Council, and Wharfedale and Airedale Review Development know that Redrow Homes have an option on development all along this arterial road should it be given the green light. This would cause immeasurable additional traffic onto a road which was not needed in the first place, on to the A65 and make it significantly worse. It does not take a traffic expert to calculate that, it is pure common sense and local knowledge. Far be it from being a relief road for the A65, it would be an open invitation to traffic chaos, urban sprawl and the merger of a tranquil village with a town. It would damage the special landscape character of the area and cause untold additional pollution. And that's *without* taking into account the thousands and thousands of houses destined for the rest of Horsforth, Rawdon, Aireborough and the *directly neighbouring city of Bradford*.

In short, the two major departments within Leeds City Council – Highways and Planning - DO NOT appear to have collaborated closely on either 'plan', nor on the cumulative effects of current traffic. Is there a cross border strategy with Bradford City? We are unable to find any solid evidence which demonstrates close consultation. The collective impact of imminent *new traffic* from new developments, the inevitable ribbon developments brought on by the 'link road', coupled with NE Bradford housing volume would be horrendous.

*The inappropriately named 'airport link road' has all the hallmarks of a developer-led idea.*

WRIGHT ENGINEERING

C. Wright 13/11/15

Analysis of transport aspects of the Leeds City Council Site Allocations Plan  
and background transport documents  
relating to sites HG2-12, HG2-41, HG3-2, HG3-3 and HG3-4

Report prepared for Rawdon Greenbelt Action Group to inform their submission to Leeds City  
Council's consultation on the Site Allocation Plan Nov 15

Wright Engineering  
Park Royd,  
2, Fernhill Road  
Shipley  
BD18 4SX

## 1. Introduction

Rawdon Greenbelt Action Group are concerned that the sites allocated for housing and safeguarded for housing development in the Rawdon area will further exacerbate existing unacceptable levels of congestion on the adjacent A65 and that local access issues in particular to site HG2-12 exist which would not be able to be overcome within the lifetime of the Leeds City Council Site Allocation Plan.

It is noted from the Leeds City Council highway comments on the Plan assessments that development of the sites would be contingent on local access improvements and on wider improvements to the A65 which is currently highly congested.

## 2. Site Access Issues

Leeds City Council highway comments highlight the following access and congestion issues:

HG3-3: Could be developed on its own without other sites due to frontage with Knott Lane good. May require junction works with A65. **Local congestion issues.**

HG3-2: If developed, this would need to be along with HG3-3, the sites would need to jointly provide a realignment of Knott Lane to provide a 90 degree approach to the A65. **A65 congestion issue.**

HG2-12: If developed, this would need to be along with HG3-2 to allow Knott Lane to be improved and access taken through this site. Improvements required to Knott Lane and A65 junction. New York Lane is unsuitable to provide vehicular access, access on to Knott Lane is only possible if combined with Woodlands Drive (which is a private road), but visibility would be substandard. **Knott Lane is currently barely suitable for additional development. Knott Lane /A65 junction alignment is poor for additional development.**

HG3-4: Frontage with side road off Layton Lane, possible junction works with A65 Adopted spur road between 24&26 Layton Lane is wide enough to create access to the site, access also available between 64&68 but is private. A single point of access would be adequate for the proposed level of development c100 units. **Local congestion issues.** Footways required on side road. Possible cumulative fund to Horsforth roundabout. **Possible access capacity works on A65.** Stand alone site.

HG2-41: Primary access to the site from a widened A65. **A65 / Ring Road congestion concern would require substantial works to Ring Road / A65 junction and widening of A65 along site frontage to provide right turning and public transport improvement.**

The SAP assessments conclude that sites HG3-2, HG3-3 and HG3-4 should be safeguarded for development beyond the current plan timescales (2028) whilst sites HG2-12 and HG2-41 are proposed for inclusion in the sites allocated for housing. The sites are currently classified as greenbelt.





The extract from the Leeds interactive map above shows the difficulty of access to site HG 2-12. As highlighted by the city councils assessment, summarised above, there is no existing public highway access to this site. Land from site HG3-2 or HG 3-3 are highlighted as being required to create a new access or re-align the existing Knott Lane / A65 junction to create adequate width and visibility for the increased traffic, but these are not currently allocated for development and it is intended that they are safeguarded until 2028. Improvements to Knott Lane are also specified as being necessary and it is not clear

- a) whether these are feasible within the existing highway and
- b) where sufficient width within the site for an access to HG 2-12 from Knott Lane would be found.

Paragraph 2.2 of the transport appendix highlights that no sensitivity tests have been undertaken around the delivery timetable of these works. Only high level, strategic issues are dealt with at this stage (para 2.3) leaving the problem of how to deal with this additional traffic in the immediate vicinity of the developments until later. That is to say that whilst it is highlighted in the Site Allocation Plan assessments for these sites that local access improvements would be required, it is not yet known whether these improvements would be feasible. We would argue that it is incumbent on the council to prove that there is a feasible local access solution before allocation for housing can be considered, especially since it is being allocated away from existing greenbelt.

### 3. Local Network Issues

#### *Current congestion on A65*

It is clear to those on the ground that the A65 adjacent to these sites is currently highly congested and this is evidenced in paragraph 4.12 of Appendix 3: Transport Background Paper where the A65 (between Rawdon and the Inner Ring Road) is highlighted as being amongst the highest levels of peak congestion, adding more than 100% to journey times inbound on the am peak.

#### *High modal share of car journeys in locations like this*

Whilst public transport options (principally bus) are available and improving from this area to the city centre, it is likely that the majority of residents choosing to live in a location such as this would not work in the city centre. Para 4.8 evidences this; “Within Leeds District 20% of residents either work at/from home or stay within their own ward; 18% work in the City Centre. A very significant proportion therefore are travelling either to another ward within Leeds or outside the District. Catering for these journeys by sustainable modes is challenging and this is reflected in the high car mode share for these trips (75%).” And 5.5 “For travel to work the diversity of destinations outside the City Centre makes it hard to cater for direct travel to these locations by public transport (unless residents live on the route of a direct bus or train service) and therefore it is important that they are linked directly to major public transport interchanges (such as the City Centre) to facilitate these journeys. This is reflected in the Accessibility Standards in the Core Strategy. It is nevertheless recognised that for many people car will remain the primary mode for a high proportion of these journeys and therefore the provision of additional orbital highway capacity will be a key outcome of the strategy.”

62% of residents are likely therefore to work in a place not accessed directly by public transport. Needing to go into and out of the city centre or change modes to reach a destination is a significant deterrent to using public transport, which will create low uptake of sustainable travel options from these locations.

#### *Transport interventions difficult at very constrained site*

Transport interventions planned in the area include a link road to the airport to support airport expansion, improvements to Horsforth roundabout and an increase in the orbital capacity of the ring road.

The airport link-road, if delivered, would not as currently planned alleviate the congestion on the A65/ A1620 Horsforth roundabout. Indeed, that the road is thought to be needed is an indication of further expected rise in traffic levels along the length of the A65 adjacent to the proposed sites which would be expected to make congestion worse.

As of late October, the signalisation of the A65 / A6120 junction has been completed. This work was designed to address existing, not future, congestion. The modelling work done using the Leeds Transport model on future traffic levels ranks the A65 / A6120 junction as the 7<sup>th</sup> most congested hotspot in Leeds and therefore in need of significant further work should the planned developments be progressed.

Signalisation of the junction allows timings to be adjusted to prioritise certain routes over others. It is clear from the transport paper that one of the current objectives is to increase the speed of traffic travelling around the ring road. If implemented, this may further increase queuing on the A65 north of the Horsforth junction.

Alongside this, the A65 / A6120 junction is noted as a very constrained site with reasons including “the location of housing and a petrol filling station on the A65 limits the scope for enhancement” and “there are building or engineering / environmental constraints which make it quite uncertain whether an improvement is deliverable”.

This casts serious doubt on whether the junction can be improved soon enough to meet the housing distribution requirements under Spatial Policy 7 (Core Strategy) and fulfil the Site Allocations in Horsforth and Aireborough HMCA.

Again, is it not incumbent on the council to prove that there is an economically feasible solution to the congestion problems on the A65, taking account of wider network issues, as part of preparing this plan? The hotspot analysis outlines that there are constraints which make it quite uncertain whether an improvement is deliverable!

#### 4. Not compliant with NPPF

In our view, these plans are not yet prepared to the standard of NPPF which requires, in paragraph 32, that plans and decisions should take account of whether safe and suitable access can be achieved to the site for all people and improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Therefore these site allocations are not compliant with NPPF.



## 5. Conclusion

In conclusion, using the council's own evidence from the site allocation plan and the infrastructure background paper we would be concerned that there is insufficient evidence to justify these site allocations to housing due to the following transport constraints:

- 1) There is no feasible solution proposed for accessing site HG2-12.
- 2) The arterial road (A65) is already greatly over capacity and does not accommodate existing traffic acceptably, let alone have space for additional traffic.
- 3) Further improvements to the A65 / A6120 junction are shown to be essential if development is not to further increase travel times on the already highly congested A65 between Rawdon roundabout and the inner ring road.
- 4) Despite improvements being shown as essential, the A65 / A6120 junction is noted as being a very constrained site and it is unlikely that a comprehensive solution to accommodating additional traffic will be found.
- 5) If the airport expansion were to be permitted, further traffic would be generated on this already congested stretch of the A65.
- 6) Traffic analysis shows a likely reliance on the car for the commuting journey of 75% in locations like Rawdon, meaning uptake of sustainable travel choices will be low due to the nature of the location.

Based on the above, the site allocations along the A65 in Horsforth, Rawdon and Aireborough are potentially unsound as they are unsustainable on transport infrastructure grounds and therefore unjustified. More work is needed to show feasible solutions to network congestion issues on the A65 and local access solutions, particularly to site allocation HG2-12. There are currently too many questions about the feasibility and deliverability of mitigation measures identified. In addition, the site allocations are not compliant with paragraph 32 of the NPPF.

Prepared by Claire Wright MEng MCIHT CEng

# Chapter 7

## HG2-12

### NOT EFFECTIVE – PHYSICAL AND LOGICAL CONSTRAINTS

Allocation HG2-12 is not sound because it is not effective.

It cannot be delivered for the following reasons:

#### I. PHASING – HIGHWAYS CONTINGENCY ON SAFEGUARDED SITES

As the comments from the Highways Agency in the site assessments make clear (see **Transport** report), access into HG2-12 via Knott Lane is not possible as Woodlands Drive is a private road. Access would only be possible via a re-alignment of Knott Lane jointly with site HG3-2 (which is itself contingent on HG3-3) to provide a 90 degree approach to the A65. Highways support for the proposed development of HG2-12 is thus contingent on the joint development of safeguarded sites HG3-2 and HG3-3. But HG3-2 and HG3-3, because they are safeguarded, should be statutorily protected from development well beyond the plan period (2028). (Please see comments on safeguarded land under **Green Belt** chapter.)

The site allocation HG2-12 is therefore undeliverable as it cannot be delivered in the plan period. The re-alignment of Knott Lane to provide access to HG2-12 cannot be justified on the basis that it would require land take and development of safeguarded site HG3-2 and HG3-3, because these are protected from development until well beyond the end of the plan period. Because there is no effective access to the site, allocation HG2-12 is therefore not effective and is unsound.

#### II. SURFACE FLOODING

#### III. MINESHAFTS

#### IV. GAS PIPELINE

## II. Surface Flooding



Site HG2-12 is a site that has an identified surface water flood risk<sup>1</sup>. There is local evidence of flooding not only in the field, but on the adjoining private roads of New York Lane and Woodlands Drive. Building on this field can only make flooding worse on the adjoining roads and housing. Garages of the houses on New York Lane have flooded regularly despite residents paying recently for additional drains on the private lane. Residents on Southlands Avenue Experience surface flooding due to bedrock believed to be in the vicinity. This area is identified by the darker blue (higher risk area) on the map above New York Lane. Rainwater from higher up in Rawdon (including the Billing) runs down New York Lane and through the stream at the side of the factory, before filtering through the culvert between Meadowside and The Ridings (2 houses on New York Lane). This stream then comes out in the field just below Southlands Avenue. Again the darker blue higher flood risk area on the map. The larger footprint of the Airedale Air-conditioning Factory on its rebuild following fire may also move further surface water towards **HG2-12** and nearby housing.

<sup>1</sup>[http://watermaps.environmentagency.gov.uk/wiyby/wiyby.aspx?lang=\\_e&topic=ufrfsw&layer=default&scale=11&x=421426&y=438952#x=421959&y=438757&scale=11](http://watermaps.environmentagency.gov.uk/wiyby/wiyby.aspx?lang=_e&topic=ufrfsw&layer=default&scale=11&x=421426&y=438952#x=421959&y=438757&scale=11)



Site **HG3-2** also shows to be an area of having surface water flood risk and physical evidence supports this with frequent pooling. Two ponds within and adjacent to the site drain into the beck at the bottom left corner of the site and overflow when it rains.

If these areas are to be built on, the flood risk is also likely to be worsened on close by housing, adjoining road and also other agricultural fields.

Building on all sites **HG3-2** is likely to cause issues for the housing on New York Lane; turning the field into mainly paving and tarmac rather than the current agricultural land is likely to cause further run-off into the culvert, which cannot cope with the current level of water. Works to address this would be costly.

Building on site **HG3-4**, **HG3-3** and **HG2-41** is also likely to cause additional water flow further downstream of Ghyll Beck, Knott Lane, Woodlands Drive and down towards the new development on the old Clariant site.

A report below highlights further issues from an expert perspective who was consulted specifically about the Rawdon sites.

## Flood Risks – from Housing Development on Rawdon Greenbelt Sites

### An Overview

By Ruth Ashton-Ward

*Environmental Specialist for Flood Management in Defra in Whitehall*

*From a flood risk management point of view, the site in question would of course become mostly impermeable hard surfaces (ie Tarmac and driveway paving that water cannot easily pass through and soak away), rather than the green fields it is currently, which act more like a slow absorbing sponge.*

*This would therefore increase surface water run off from the site, and potentially increase flooding occurrences downhill from it, especially in times of heavy rainfall, and in view of the fact that the climate is changing, with more occurrences of 'tropical Monsoon' like flash storm/cloudbursts that can dump a large volume of rain on an area at a given time.*

*We have evidence that the Cragg Wood main access road, Woodlands Drive, near the bollard floods regularly, this could serve to increase that flood risk, thus cutting off main access to Leeds.*

*There could be further potential impact of flooding to the River Aire, since the sites are not far uphill of the floodplain. How will local watercourses cope with the increased run off to them? They could overflow and absorb/damage valuable local farmland.*

*Increased volumes of water entering the Aire could increase flood risk further down stream, even Leeds City Centre (cumulatively this is something Leeds CC needs to be aware of from ALL these development sites near the Aire, not just in Aireborough, because they are the Lead Local Flood Authority (LLFA) for this area, and as such have responsibility to manage flood risk in and around the Aire.*

*Is the developer of such a housing site prepared to invest in SuDS (Sustainable Drainage Systems) for the housing site, (and by design then not be connected to the local YW Surface water drainage network?). This will soon be a requirement under the Flood and Water Management Act 2010, but currently some volume builders are doing this voluntarily.*

*It does mean sacrificing housing plots to providing for Swales (shallow drainage channels, often with reed beds to filter out pollutants) or filter drains, so damages their profits, so there is a great deal of reluctance to have to do it, and not have that convenience of easily connecting to YWs surface water drainage network.*

*However, even this water will have to soak away to somewhere, either into the groundwater network, or to local watercourses. Watercourses we have already questioned regarding capacity.*

## **FLOODING ON WOODLANDS DRIVE – Sunday 15 November 2015**

ALL these photos were taken on this day.



***Photos taken on Woodlands Drive***

This is typical activity when it rains – water drains from Rawdon Billing hill down the slope of the valley, through Cragg Wood across Woodlands Drive, drains into the fields down into the River Aire. This is NOT a built up area. It is sparsely populated.





***Photos taken on Woodlands Drive***





***River Aire – Apperley Bridge, taken from the George and Dragon Bridge, NE Bradford 15.12.15***

A Rawdon resident took these photos and sent them to the group with the following comment:

*"I've just been for a walk on Woodlands Drive and encountered terrible flooding. I know you are submitting a report to the consultation and wondered if these photos would be of help? For what it is worth, you could feel the water running from the upper houses in Cragg Wood, across the road and down to the river. It wasn't just a raised water table &/or the Aire being flooded upstream in the Dales. And this is just storm number 1 of the Winter!"*



### III. Mining/Quarrying

Parts of the sites have been used for mining and quarrying. The OS Map of 1851

(Map 1) clearly shows coal pits and the Colliard Quarry on site **HG2-12**; coal pits on sites **HG3-3**, **HG3-4** and a sandstone quarry alongside site **HG2-41**. The OS map of 1888 (map 2) additionally shows a coal pit on site **HG2-41**. There are open shafts on sites **HG2-12** and **HG3-3**. Overall there were 7 pits in the area. There are also various faults in the area – one alongside on the current Airedale Factory adjacent to site **HG3-3**. (map 3)



Map 1 1851 OS 6" map



Map 2 1888-1913 OS



The **Coal Authority** website also shows significant mine entries on each site .(Map 3) and probably shallow mine workings on **HG2-12** and **HG3-3** (map 4).

**Map 3**



**Map 4**



**Map 5**



**Map 5** shows the potential zone of influence – ie

*“A Mine Entry with Potential Zone of Influence is the area of the ground that might be affected if subsidence of the mine entry was to occur.”<sup>2</sup>.*

This shows significant areas of sites **HG2-12**, **HG3-3**, **HG2-41** potentially affected by subsidence.

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<sup>2</sup>

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/361732/Mine\\_Entry\\_Zone\\_of\\_Influence\\_Metadata\\_V4.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/361732/Mine_Entry_Zone_of_Influence_Metadata_V4.pdf)

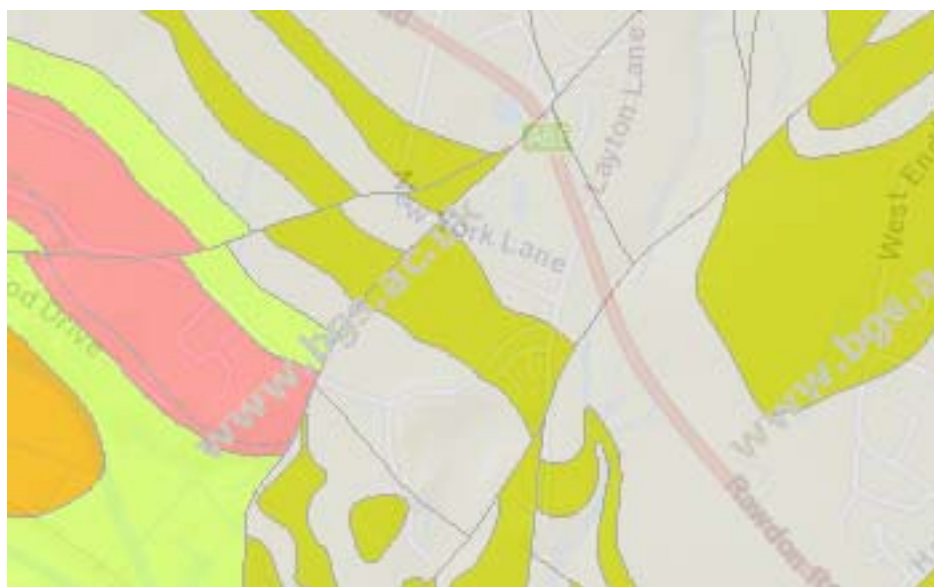
**Map 6** shows the areas that are Development High Risk Areas within **HG2-12, HG2-42, Hg3-3 and HG3-4**

**Map 6**



The houses built on Southlands Avenue had to be “built up” as it was impossible to dig foundations deep enough. Indeed, house building came to an end it is locally believed, because the bedrock proved too challenging to persevere. Given that the ‘Knott’ was a quarry of Yorkshire Stone it would explain this. Building on site **HG2-12** would also produce difficult building conditions. **Map 7** shows the bedrock issues across site **HG2-12**. (British Geological Society). A report completed for the Airedale Airconditioning Factory rebuild commented “The south-western corner of the site and the far north-western tip of the site are indicated to be within Development High Risk areas. Shallow mine workings may therefore exist beneath these parts of the site<sup>3</sup>.” The south-western corner of the site abuts site **HG2-12**.

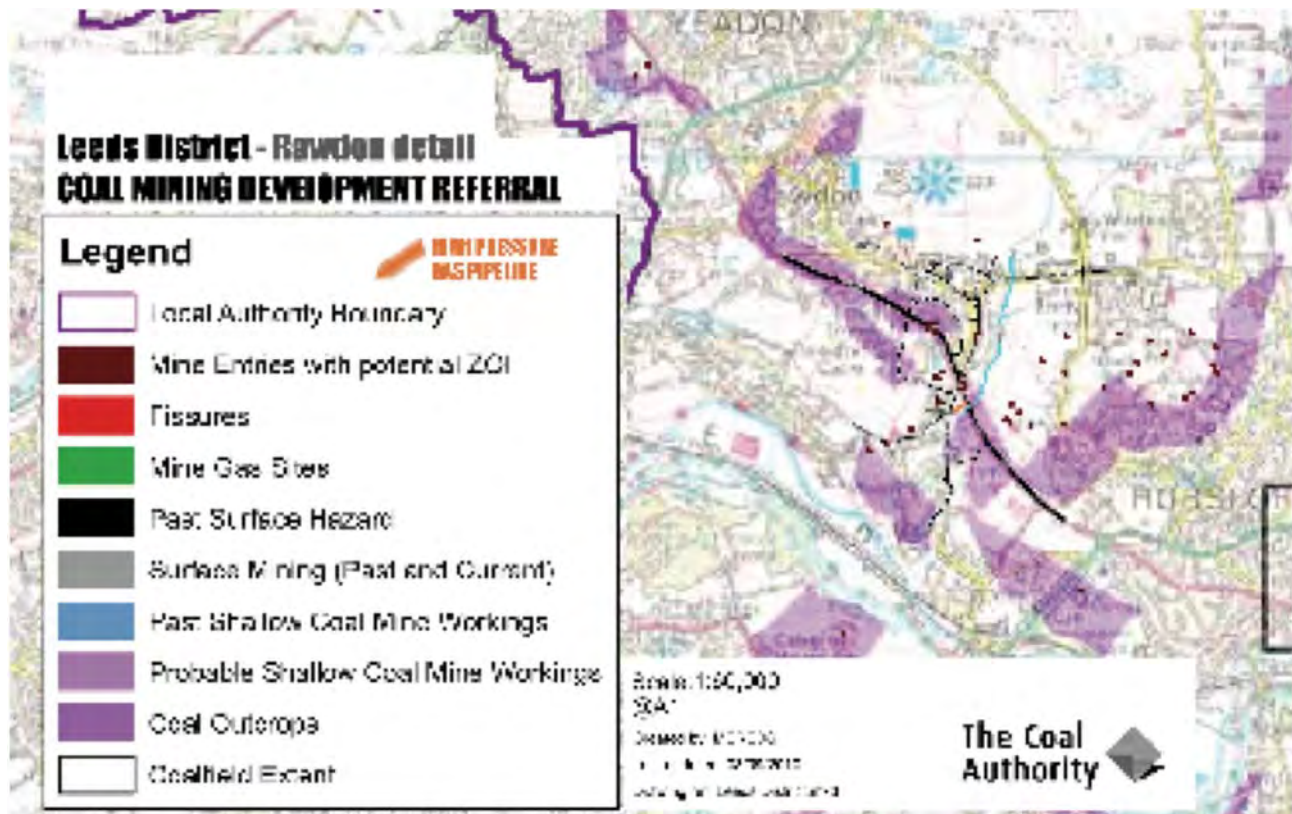
**Map 7** (green – bedrock, grey lines – faults)



<sup>3</sup> <http://plandocs.leeds.gov.uk/WAM/doc/BackGround%20Papers-944761.pdf?extension=.pdf&id=944761&location=Volume4&contentType=application/pdf&pageCount=1>

The proposed sites (**HG2-12**, **HG2-41**, **HG3 -3**, **HG3-4**) are sites that have been affected by mining activities and sit **HS2-12** has unsuitable bedrock; we would assess them as unsuitable for building on.

ZOI's – Rawdon detail taken from The Coal Authority Map. Forgive quality, however one can clearly see that this area has several ZOI.





### III. GAS PIPELINE

Northern Gas Networks High Pressure apparatus run across the entire lower half of HG2-12. In fact they continue across Knott Lane, and then across HG3-3 and beneath the A65.

In a letter to one of our volunteers dated 4.6.2013 Northern Gas Networks confirm this and add detailed warnings, in including:

“There is High Pressure apparatus in the vicinity. It essential that no work or crossings of this high pressure pipeline are carried out until detailed consultation has taken place.”

Additionally, they also stress the presence of Low/Medium/Intermediate Pressure Gas Mains in the vicinity.:

“You will also note the presence of our Low/Medium/Intermediate Pressure gas main in the proximity to your site. NO mechanical excavations are to take place above or within 0.5 m of the Low pressure system, 2m of the medium pressure system and 3metres of the intermediate pressure system.”

And provided a detailed dossier of the legislation including Areas of easement (non development minimum distances) and safety legislation in accordance with with HSE publication HSG47 "Avoiding Danger from Underground Services".

Letter attached.

Here follows two diagrams which illustrate the location of the high pressure pipeline and the minimum easement area.



Northern Gas Networks  
1st Floor  
1 Emperor Way  
Doxford International Business Park  
Sunderland  
SR3 3XR

Telephone No: 0845 634 0508\*  
[www.northerngasnetworks.co.uk](http://www.northerngasnetworks.co.uk)

**24 hour gas escape  
number 0800 111 999**

\*calls will be recorded and may be monitored

Our Ref: 301190548  
Your Ref: E-MAIL ENQUIRY  
Date: 04.06.2013

Mrs Briony Spandler  
19 Southlands Avenue Rawdon  
Leeds LS19 6JN

Dear Sir / Madam,

**Re: Potential Housing Development, Area around, Southlands Avenue, Rawdon, Leeds.**

Northern Gas Networks acknowledges receipt of your notice of your intention to carry out work at the above location.

We enclose an extract from our mains records in the location of the area covered by your proposals together with a comprehensive list of precautions for your guidance. This plan shows only those pipes owned by Northern Gas Networks in its role as a Licensed Gas Transporter (GT). Gas pipes owned by other GT's and also privately owned may be present in this area. Information with regard to such pipes should be obtained from the owners. The information shown on this plan is given without obligation, or warranty, the accuracy thereof cannot be guaranteed. Service pipes, valves, siphons, stub connections, etc., are not shown but their presence should be anticipated. Your attention is drawn to the information and disclaimer on these plans. The information included on the enclosed plan should not be referred to beyond a period of 28 days from the date of issue.

**There is High Pressure apparatus in the vicinity. It essential that no work or crossings of this high pressure pipeline are carried out until detailed consultation has taken place.**

You will also note the presence of our Low/Medium/Intermediate Pressure gas main in the proximity to your site. NO mechanical excavations are to take place above or within 0.5 m of the Low pressure system, 2m of the medium pressure system and 3metres of the intermediate pressure system. You should where required CONFIRM THE POSITION of mains using HAND DUG TRIAL HOLES.

**A colour copy of these plans and the gas safety advice card should be passed to the senior person on site in order to prevent damage to Northern Gas Networks plant and potential direct or consequential costs to your organisation.**

Safe digging practices, in accordance with HSE publication HSG47 "Avoiding Danger from Underground Services", must be used to verify and establish the actual position of mains, pipes, services and other apparatus on site before any mechanical plant is used. It is your responsibility to ensure that this information is provided to all persons (either direct labour or contractors) working for you on or near gas apparatus. In addition please follow the advice given on the gas safety card. It must be stressed that both direct and consequential damage to gas plant can be dangerous both for your employees and the general public, repairs to any such damage will incur a charge. Your works should be carried out in such a manner that we are able to gain access to our apparatus throughout the duration of your operations.

**You must contact Neil Hampshire, Network Support Officer on Telephone No. 0113 2768272 before starting work.**

If you have any further enquires please contact the telephone number below.

Yours faithfully,

SANDRA COLLETT  
Network Records Assistant  
0845 6340508 ( Option 6 )

Northern Gas Networks Limited  
Registered in England & Wales No 5167070  
Registered Office  
1100 Century Way Colton  
Leeds LS15 8TU







## CONCLUSION:

These three factors would combine to result in a development which would be severely restricted in terms of scale and very expensive to deliver, making it unviable. Further, the highways works that would be needed to re-align Knott Lane to provide a 90 degree approach to the A65, in combination with these other factors, would make development unviable.

## Chapter 8

# LEGAL COMPLIANCE

### Lack of community consultation

Neither **HG2-12** nor **HG2-41** was included in the Issues and Options stage of the SAP consultation in June / July 2013. Site HG2-12 and HG2-41 came forward in January 2015 when the agenda of the Plans Development Panel was published. This information was shared with our group by a friend working for the Council, otherwise we wouldn't have known to then inform our local community in our campaign!

This means that the site(s) were not subject to the same consultation with the public as other sites in Aireborough and North Leeds HMCAs. While this fact is not of itself an issue of non-compliance (since sites can come forward later in the day), the fact that these sites were immediately given 'allocated' status in the draft Site Allocations Plan, without any prior consultation, is very troubling. It is also strange since Leeds City Council stated that it had a surplus of sites generating over 700 potential houses in Aireborough at Issues and Options stage in June / July 2013.

While the sites could not apparently have been consulted on during Issues and Options stage (since they were proposed later), they should still have been subject to reasonable consultation with the community between 5 January 2015 (for HG2-41) and now. No such consultation or engagement took place.

This is contrary to the Council's Statement of Community Involvement and is therefore not legally compliant.

In the Issues and Options consultation, sites HG3-2, HG3-3 and HG3-4 in Rawdon were coded green by the Council, but following public consultation, they were taken out of allocation and given safeguarded status.



It is likely therefore, that had HG2-12, which is in a similarly, if not more, sensitive area, been subject to the same level of public consultation, it would not have been given allocated status, but granted at least the same protection afforded to these surrounding safeguarded sites.

The community has not been consulted about the allocation of HG2-12 for housing until now (Site Allocations Plan consultation in September – November 2015). Community and residents' groups such as Rawdon Parish Council, Rawdon Greenbelt Action Group, the Cragg Wood Roads Committee, Horsforth Civic Society, Aireborough Civic Society, and others were totally unaware of the proposed site allocations until now. We have had to work extremely hard and fast to make people aware of it, by rushing out websites, leaflets and posters and organising drop-in events, while at the same time trying to get to grips with the huge issues and vast amounts of material relating to the site allocations, and the extremely complicated methods of response required by the Council (see its online form) – all within eight weeks. This is on a voluntary basis over and above our normal full-time jobs and family commitments. We have had to drop everything – we have done nothing but this for the past six weeks. Why then could the Council not have undertaken this public engagement when it had a budget and a year and three-quarters to do so?

The small amount of those individual members of the Community and community groups mentioned above who have made it their business to try and find answers to important and valid questions relating to the Core Strategy and the Site Allocations Plan have been turned away. Repeatedly given the wholesale answer of 'wait until public consultation' when they have contacted a broad range of Council staff in the Site Allocations Team, Executive Board, Development Plans Panel members. The 'plan' has been evolving for years. Given the nature of the extremely high target number of dwellings planned for the city, why hasn't the Council more regularly engaged with community members, particularly those who have a duty to draw up a Neighbourhood Plan? Yet, we know for sure that housing developers have had regular meetings with Council representatives and planners right from day one. We appreciate that we are 'the public', not experts, but given the enormity of the impact the plans will have should they go ahead, on the communities, far more engagement should've taken place. This refusal to listen and engage – 'wait until public consultation' been the only message we are worthy of - has resulted in a swell of anger and mistrust unlike anything we have seen before in our community. Is it any

wonder that people have felt compelled to demonstrate publically their anger and frustration?

Our group joined an organisation called Community Voice On Planning (CoVoP) which exists to give voice to small groups like ours, struggling to be heard. They organised a national event called 'Listen To The People's Voice On Planning' and invited groups to have an event to raise awareness about local planning matters. RGAG decided to have a circular walk around the beautiful greenbelt between Rawdon and Horsforth and Ghyll Beck. We called it 'March For Greenbelt' and publicised it around the village. It happened in April 2015.





400+ people joined the march, not just from Rawdon Village – from Horsforth Town, Guiseley, Menston, Yeadon, Nether Yeadon – and beyond! Four neighbouring NE Bradford groups also joined us. The weather was absolutely shocking – it rained torrentially and incessantly for the whole 2 hours of the walk. BUT everyone turned up and did it. It was an enormous expression of the strength of community feeling and love for our landscape. The march was attended by cross party representatives including our local MP, Councillors, Horsforth Town Councillors, Parish Councillors. It was covered by BBC Look North. It was covered in the local press too.



We invited Council representatives to join us, and talk to people from throughout the community about their concerns but they declined. It was such a shame, we really hoped it would make a difference - a golden opportunity for the Council to engage.

Following on from the march, we asked the Council for a meeting to discuss our concerns and received the same flat reply **'wait until public consultation'**.

As awareness within the community grew, we also joined a group who decided to protest outside the Civic Hall at the very last minute, when the Council announced confirmation of their 70,000 housing target, which shocked many city wide groups. The protest attracted



publicity in local television channels. The strength of frustration and at being repeatedly fed the same line from the Council has inevitably led to these demonstrations of feeling.

**BBC Look North**

<https://www.youtube.com/watch?v=r4NQ0shypNk>

**ITV Calendar**

<https://www.youtube.com/watch?v=3KJySKJu71E>

**Made In Leeds – top story**

<https://www.youtube.com/watch?v=zK6Gv0K1qmY>

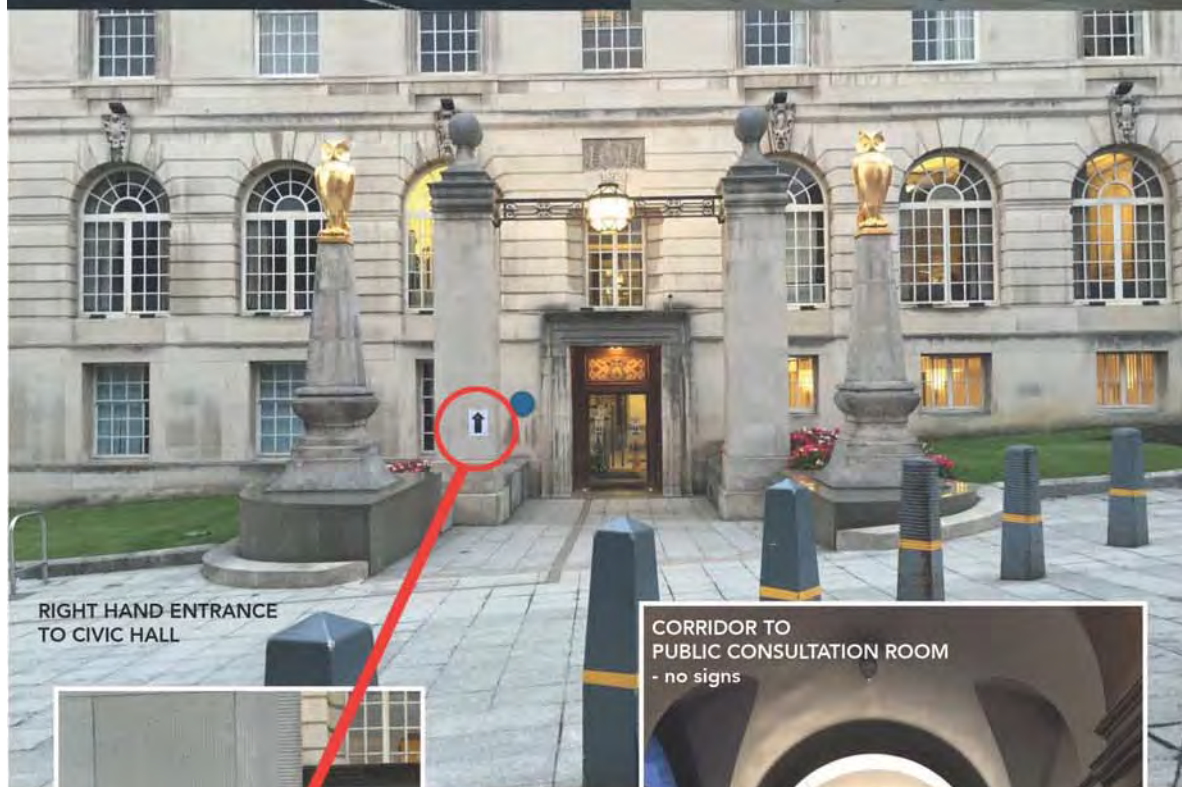
RGAG has found that universally, Rawdon residents and the wider community in Aireborough, Horsforth and beyond, were unaware of the site allocation and consultations until made aware of them by RGAG and Rawdon Parish Council. For example, all 30 visitors to a drop-in session held by RGAG at the end of October 2015 said that they were unaware of the proposals until they received a leaflet by RGAG through the post. Many people still do not know about it or understand how to respond as we go to press with our own response. We have had to do two jobs: write our own response (with all the background reading and research involved) and publicise the consultation in the community to people who had absolutely no idea it was happening. We have effectively had to drop everything, and from a standing-start, put together an awareness campaign to help the community understand what's happening and finalise our response in just eight weeks. There was no forewarning of the dates – 'Autumn 2015' was all anyone was told. Just four days before the Consultation began we got a notification email of the dates! We have found that many, many people had not even heard about the Issues and Options consultation that preceded this one.

For the Council not to have tried to engage the local community in issues which will affect them profoundly and permanently, is totally unacceptable. The Council has not taken reasonable steps to publicise the consultation. It has not been comprehensively advertised in broadcast, print or online media. There has been no PR campaign. Has the Council relied on community groups to do this work for them for free? Or has it deliberately chosen not to publicise it properly? The sentiment shared with the group by many members of the public has been "when the bin collections change the Council can get every house a letter to notify then, why not do that for the public consultation?". The documents necessary to

respond to the consultation and understand the decision-making process are not easy to find on the Council's website and are inches thick. They require many hours to read and understand. In fact, it would not be an exaggeration to say one might need to be a planner only to understand them. *Our village action group has managed to rally round, disseminate the information that is available, and translate it into a fairly clear and hopefully effective awareness campaign in eight weeks –we are volunteers, we have jobs.* The Council held Drop-Ins during the last eight weeks. The following images show how these were advertised leading towards and within the venues.

The first was held at the Civic Hall in Millemium Square. The timing was not good given that it was the launch of the Rugby world Cup on the same day.

The photos below were taken by a member of the action group because they were surprised they couldn't see how to get in or where it was. This was the launch day of the Public Consultation on Tuesday 22 September. The following photos are a couple which show the extent of advertising in the area.







HORSFORTH DROP IN Day – NO ADVERTISING



Guiseley – advert on phone box – the **ONLY** public advert for the whole of Aireborough. Removed after drop in held on 24 September.



**Rawdon Library were sent a batch of documents and the Core Strategy**

*The documents which were sent for the public's perusal during the Consultation were irrelevant to our locality— they were for the Aire Valley Consultation (important of course) but there were NONE on display for the Site Allocations Plan!*

### **Lack of consultation with statutory consultees**

It is not only the community who have failed to be consulted about the proposals. Given that HG2-12 and HG2-41 first came up for consideration in **XXX**, the Council has had more than enough time to consult *Historic England* and other statutory consultees about the impact of the proposals and the suitability of the sites. However, given the absence of comments from Historic England and other statutory consultees *Yorkshire Water* and *Northern Gas Works* (both of the latter have not been consulted on these sites) for HG2-12 and HG2-41 in their respective site assessments, it is not clear that the Council consulted Historic England or others about these sites prior to publication of the draft Site Allocation

Plan. Given that Historic England subsequently submitted representations that both site allocations were *unsound* (response dated 21 October 2015) it must be concluded that they were not consulted prior to the publication of the SAP. The Council had a year and three quarters after the site was first put forward to consult about the site. The fact that it did not shows that it has not taken reasonable steps to comply with its statutory duty to consult under the Statement of Community Involvement. For these sites to be granted allocated status, without the required statutory consultation with public bodies and the community, is not legally compliant and therefore the allocations are unsound.

### **Not acting on results of consultation**

Even concerning sites where it has consulted Historic England and others, the Council has not acted on the advice that it has sought, contrary to indications it gave at the time. When consulted on its sustainability assessment and site allocations at Issues and Options stage in June / July 2013, Historic England submitted its concerns that before allocating sites close to historic assets (including conservation areas or listed buildings), there needs to be an assessment of what contribution the currently undeveloped area makes to the significance of the building or area and what effect its loss and subsequent development might have upon the significance of these assets. If allocated, development proposals would need to ensure that those elements which contribute to their significance, including their setting, are not likely to be harmed. The Council said it would consider detailed mitigation measures to reduce or remove the harm.

It is now 2015 and it is clear from Historic England's comments on the Site Allocations Plan draft publication of 21 October 2015 that the Council did not act on this advice. It has not carried out any assessment of potential harm, nor proposed mitigation measures to reduce that harm, with regard to conservation areas or other assets. It is not appropriate for the Council to argue that the proper time to consider mitigation measures is at planning application stage, since this is contrary to Historic England's advice and the proposed changes to the plan that the Council agreed to make back in 2013. Clearly, by the time a planning application is made, the principle of development has already been established, and it would be too late to remove a site from allocation, if mitigation measures were shown to be inadequate to reduce or remove the harm of a proposed development. The failure of LCC to act on the advice it has received through the consultation process is not reasonable and not legally compliant.



## **Duty to Cooperate**

The duty to cooperate was created in the Localism Act 2011. It places a legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters.

The cooperation should produce effective and deliverable policies on strategic cross boundary matters.

## **Green Belt review and site allocations on Green Belt**

Given its proximity to Bradford and the narrow area of Green Belt that separates Leeds from Bradford, together with the similar stages which the two cities' local plans have reached and the need that both cities have identified to release large amounts of Green Belt land for development, it would have been preferable for Leeds Council to have undertaken a joint review of the Green Belt. The findings of the Inspector at Core Strategy stage and the requirement to undertake a comprehensive review provided an appropriate opportunity for Leeds to do this, which it did not pursue.

At the very least, given the large amount of proposed site allocations on Green Belt bordering Bradford in Aireborough, Outer West and Outer North West and similar pressure on the Green Belt from Bradford, it is imperative that Leeds fulfils its Duty to Cooperate on this issue so that *'the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities'* (NPPF paragraph 182), and to ensure that a consistent methodology is used in appraising the shared Green Belt. Otherwise Leeds' review of the Green Belt cannot be comprehensive or strategic.

There is also a potential for strategic joint working to identify whether there is potential surplus of supply in North East Bradford or other parts of Bradford that may be able to accommodate some of the housing share for Aireborough, should its housing target prove unsustainable or undeliverable in the HMCA.

Planning Minister Nick Boles is actively encouraging local authorities to have conversations with their neighbours about how housing need can be satisfied elsewhere in the region when Green Belt land provides a vital split between urban areas.

It is not clear how Leeds has fulfilled its Duty to Cooperate with Bradford and other local authorities on these issues. Rawdon Parish Council is aware of only one meeting between Leeds City Council and Bradford MBC and further clarification is sought to establish that the requirement for effective joint working between the principal authorities has been demonstrated and whether it has explored opportunities to satisfy housing need across its border.

## Chapter 9

# Sustainability

### **Health – Rawdon**

Research project by group volunteer who is also a professional researcher

#### **HEALTHCARE PLANNING at LEEDS CITY COUNCIL**

I rang the Council to enquire what's been done for the plan in relation to assessing the sustainability of the city's health services when the 70,000 houses are built. Worryingly, it seems – very little.

***A 'Rapid Health Impact Assessment' was done for the core strategy.  
No more are planned.***

LCC estimate that 70,000 new developments will mean an extra 5-6 GPs per year for the city as a whole between 2012-2028.

No information was available about dentists, which would suggest that a sustainability appraisal had not been done.

#### **HEALTHCARE PROVISION**

##### **GPs**

I rang round the GP surgeries in Rawdon, Horsforth and Guiseley and spoke to most of the practice managers. None of them have been consulted about the proposed developments.

Most said they would probably try to expand to cope with extra patients as more patients equals more money and they are essentially private companies. Some said they are at capacity already and would struggle with the size of their buildings. Extra capacity has been created recently as surgeries under 2 out of the 3 clinical commissioning groups (CCGs) in our area have recently adopted longer hours on weekdays and introduced weekend appointments, though this would often mean seeing locums. One surgery in Horsforth only accepts LS18 postcodes.



## DENTISTS

There are no NHS dentists in Rawdon.

Only 1 of the 2 NHS dentists in Horsforth is accepting new patients at the moment. One of those (Smile) has approached the PCT for more funding to cope with the Clariant development but they have not heard back.

Both NHS dentists in Yeadon are full and have closed their waiting lists for new patients.

## MENTAL HEALTH SERVICES

These are run city wide, not locally and are very stretched. Waiting times for counseling can be very long, is the general consensus. Specifically, there is an 18 month wait to see a cognitive behavioural therapist or a rape crisis counsellor at the moment (according to a Practice Manager in Yeadon)

## POPULATION PROFILE - 2011

In the last census of 2011, the population of Rawdon (Leeds 027 Middle Layer Super Output Area) was **7,851**.

It's an affluent area. 76.5 % were owner occupiers in 2011 (with and without a mortgage), against 63% in England as a whole.

86.4 % were described as being in very good or good health against 81.4% in England.

3% were in bad or very bad health - 5.4% in England.

5.7 % said their day to day activities were limited a lot - 8.3 % in England.

There were *higher percentages of older people* than in Leeds as a whole, and the UK in general:

### Age structure

|        | <b>Rawdon</b> | <b>Leeds</b> |
|--------|---------------|--------------|
| 0-17   | 20.9 %        | 20.6%        |
| 18-29  | 12.6%         | 21.2%        |
| 30- 59 | 41.6%         | 38.4%        |
| 60-74  | 16.3%         | 12.8%        |
| 75 -   | 8.7%          | 6.47%        |

Mean age was 41 - compared to 39.3 nationally

## 2001

The population numbers have hardly changed since the 2001 census - Pop **7,598**

There were more home owners in 2001- 82.18% against 68.7% in England

There were more people in good or fairly good health 92.93% (90.97 Eng)

But more who were not in good health - 7.07% (9.03%England)

And more had limiting long term illness - 14.57% (17.93%) England

Age structure - again the population of the area was over represented by people in the second stage of their working lives and of retirement age and under represented by young adults.

|       | Rawdon% | Leeds% |
|-------|---------|--------|
| 0-17  | 20.5    |        |
| 18-29 | 13.6    | 18.32  |
| 30-59 | 44.08   | 39.3   |
| 60-74 | 13.34   | 12.7   |
| 75 -  | 8.93    | 6.66   |

Mean age was 40.65 (36 Leeds and 37 England)

**IMD FIGURES** - Leeds 027 D Lower Level Super Output Area (closest to sites HG2-12, HG3-2, HG3-3, HG3-4, HG2-41

In the latest Index of Multiple Deprivation (IMD) this area was ranked 31,665 out of 32,482 in England, where 1 was the most deprived and 32,482 the least.

This is broken down further by income; employment; education, skills; health; barriers to housing and services; the living environment; and crime (England).

Health wise it is better than 75% of areas of England, barriers to services are 61% better.

The living environment is 65% better.

### ***Contacts consulted in the creation of this report***

Clare Welsh - Health Planner at LCC 0113 247 8088

Shaq Rafiq NHS Leeds West Clinical Commissioning Group 0113 843 5529

Janet Howie – LCC

she was looking at 'health' for the Site Allocations Plan for LCC at the time this research was done. No contact number yet.

## **Agricultural Land**

### **A farmer's perspective**

The tenant Farmer of HG2-12 is from a well known, successful Rawdon farming family who have farmed Rawdon for centuries. His farming and slaughtering business is the second largest in Rawdon, being the second largest employer after Airedale.

The land owner, an elderly relative of the farmers, was approached by developers to sell up. He decided to sell the land without consulting his tenanted nephew. He recently ended his tenancy agreement with immediate effect.

As a result, the tenant farmer told Rawdon Greenbelt Action Group that he has lost all the business he made from the field - grazing cattle, sheep and feedcrops. He's putting it down as a loss and can't replace it because the rest of his land is occupied and other farm land he might normally rent in Rawdon or Horsforth is also being considered for development. He was sincerely sad about what's going on, both with his field and the amount of 'hassle' as he put it, that he is getting from housing developer to sell off his land. He said they are 'desperados' approaching every farmer in this, the Calverley Valley to sell up. He said his family have farmed this land for centuries and what's happening is terrible.

He's thinking about whether he should re-locate because local farm land is becoming so threatened locally that he's worried his slaughter business could suffer too. If this happens, Rawdon will suffer massively. Local employment will fall dramatically and rich Grade 3 agricultural land will be built over.

The farmer's business hours are having to be changed to adjust to the increasingly heavy traffic problems with the A65. He is having to change hours of business, sending out trucks far earlier in the mornings now to avoid the traffic at normal peak times.

The Farmer has been building his own house a few hundred metres from the field HG2-12, but he has put it on stop because he is worried that it will overlook a housing estate instead of an agricultural and wooded landscape.

He is feeling pressure to consider the location of his business, and therefore his personal future, because a developer has got an option on a field he tenants.



## Employment

### Airedale International Air Conditioning

Rawdon's largest employer is Airedale International Air Conditioning, based on the A65 just past Knott Lane and adjacent to HG3-3 and HG2-12. Airedale employs 350 staff on the site alone. Airedale have written to the Council, to state that the already congested A65 makes it difficult for the business to perform its function. With additional housing, it would be to the detriment of their business setting and brand image, and potentially create further risk of harm to their driver and commuter. Having invested significantly in the new build factory, Airedale have shown faith in Rawdon community, wishing to remain here where the majority of their employees live – in Rawdon.

### John Penny & Sons

Agriculture and farming is the third biggest industry in the area in terms of employees, but in terms of area covered per hectare, it is the most dominant. This cannot be overlooked when considering the major impact developments would have on the local economy and Rawdon's ability to contribute to sustaining employment opportunities in the locality.

The farm and abattoir business based on the A65 towards the Rawdon lights, is also another large employer in Rawdon, employing over 70 staff and having over 500 customers – mainly retail butchers. The business, which has been going since at least 18<sup>th</sup> century relies upon the road infrastructure to deliver its meat to its customers in its fleet of vans. It also relies on having enough farmland to raise the cattle that then goes to its abattoir. It also needs enough land to grow crops and feed for the animals. Without all of this, there is no business and no employment. As per the previous page, the farmer who owns this business lost all the business he made from the field HG2-12 - grazing cattle, sheep and feedcrops. He's putting it down as a loss and can't replace it because the rest of his land is occupied. Other farm land he might normally rent in Rawdon or Horsforth is also being considered for development. He was clear that there is an air of uncertainty amongst Aire Valley farmers and the future of farming in this semi-rural city fringe.

### EMIS

Emis have 3 sites in Rawdon/Yeadon employing over 600 staff in total between those sites. It is a rapidly growing company; in 2012 alone it recruited an additional 280 staff. Very significant parking issues already exist close to the JCT roundabout and through residents streets within the locality and Little London conservation area following the expansion of this business. Whilst this expansion is good news for the area, it has also come at the expense of increased traffic along the A65.

Building on any of the sites in Rawdon – HG2-12, HG2-41, HG3-2, HG3-3, HG3-4, could have a negative impact on two out of the three major Rawdon employers.

## Education

Rawdon is served by 2 primary schools (Rawdon St Peters CofE and Rawdon Littlemoor) and a secondary school (Benton Park). There is also an independent school - (Woodhouse Grove - secondary) and Bronte House - primary), on the boundary with Apperley Bridge, Bradford. Although, many Rawdon residents attend school outside of the Rawdon area – either going to the nearest catholic primary schools (St Mary's, Horsforth and St Peter and Paul, Yeadon) and also to secondary schools outside of the area - St Mary's at Menston and Abbey Grange CofE. Up until last year, Horsforth School was Rawdon pupils' nearest secondary school but they have now limited entry to students only living in LS18 postcodes.

Both Rawdon Littlemoor and Rawdon St Peter's Primary are oversubscribed, with far more pupils putting them down as their first choice than there were places last year. Rawdon Littlemoor 56 1<sup>st</sup> choices and 85 2<sup>nd</sup> choices for 45 places. Rawdon St Peter's: 53 1<sup>st</sup> choices and 23 2<sup>nd</sup> choices for 45 places. <sup>1</sup> The Local Government Association predicts even worse shortages of places next year. <sup>2</sup> Children not being able to go to their local school causes further disruption: difficulties regarding travel to school are likely to be a particular problem in an already heavily congested area. In terms of Secondary schools, children living close to the Rawdon/Horsforth border (Layton Lane, New York Lane, Southlands Avenue, Knott Lane etc), are not actually within the Benton Park cut-off area<sup>3</sup>. With Horsforth having far more applications for places than actual places (and considerably more house building in the Horsforth area currently underway), it may be highly unlikely that people living in this area in the next few years could actually be offered a place at either of the 2 closest secondary schools.

School places in the area are already under considerable pressure. Further housing will inevitably lead to children having to travel out of the area for both their primary and secondary schooling. The local infrastructure is not set up for this additional travel. Children will inevitably miss out; maybe not living close to classmates, having to spend additional time travelling to and from school and not feeling part of the local community.

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<sup>1</sup> <http://www.leeds.gov.uk/residents/Pages/SchoolsSearch.aspx>

<sup>2</sup> [http://www.local.gov.uk/web/guest/media-releases/-/journal\\_content/56/10180/7171350/NEWS](http://www.local.gov.uk/web/guest/media-releases/-/journal_content/56/10180/7171350/NEWS)

<sup>3</sup> <http://www.leeds.gov.uk/docs/BentonPark.pdf>

## *Precis*

School places in the area are already under considerable pressure: Closest schools are Primary: Rawdon St Peters CofE, Rawdon Littlemoor; Secondary: Benton Park and Pudsey. They are over-subscribed. Further housing would inevitably lead to children having to travel outside the area and may not live close to classmates.

## **ALTERNATIVE SITE FOR EDUCATION**

The Horsforth site **HG2-43** is a college campus. This would seem a more suitable alternative option to locate a new secondary school than **HG2-41** avoiding the need to build a school on a greenfield site, adjacent to the sacred grounds of Rawdon Crematorium and it's tranquil setting.



## Crematoria and Cemetery

At present there are two areas in Rawdon that come under this category:

***St Peters Church*** - has a graveyard that is to capacity

***Rawdon Crematorium*** - occupies the south eastern corner of Rawdon

This facility is used by not only Rawdon and the surrounding vicinity but is the main crematoria for northern Leeds and parts of Bradford.

Development of houses are proposed very near to the crematorium and in fact bordering its boundaries.

Going ahead with these further developments would not only create a huge increase in the local population that would over stretch the crematorium's resources but in addition create traffic problems for an area that is used by mourners as they enter and exit and have time to contemplate and visit a calm and peaceful space in which to grieve their loved ones.

In addition these areas that surround the village boundary with Horsforth Ghyll Beck '*red beck*' - are partly conservation and all greenbelt, established to protect the area that is rich in flora and fauna.

## Leisure Facilities

Rawdon residents rely very heavily on the surrounding countryside for the majority of leisure activities. The open space, network of footpaths and bridleways and ancient woodland provides a free and accessible amenity. The countryside landscape is a treasured community asset, when the village is bordered by town developments, it is almost a 'green oasis' which costs nothing. It is frequently used for cycling, walking and rambling, running, dog walking, bird watching.

*Athletes The Browlee Brothers have lived and trained in the area all their lives, and are advocates of the greenbelt campaign, having supported previous public awareness activity to alert people to the threat of development to the local landscape.*

The nearest leisure centres are Holt Park (4 miles) and Aireborough in Guiseley (2 miles). There is one park in Rawdon – Micklefield Park, close to the border with Yeadon. Buildings adjacent to the park are currently empty and there is talk of them becoming apartments. New housing development would clearly put significant strain on the limited leisure facilities on offer.