



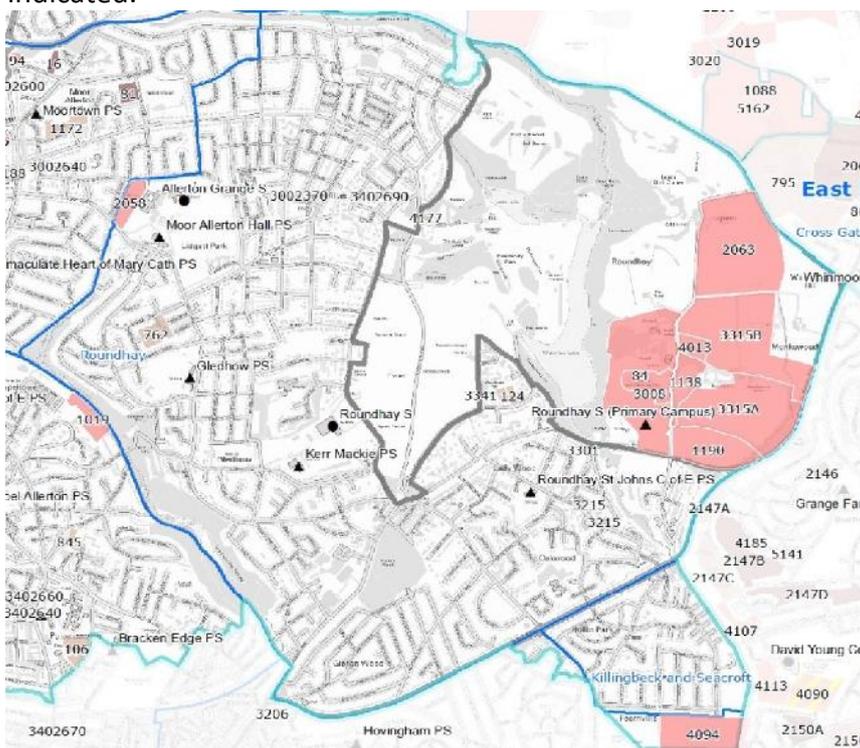
Horsforth Town Council

Horsforth Town Council (HTC) response to Leeds City Council (LCC) Site Allocations Plan (SAP) Consultation.

These responses are based primarily on sites HG2 41 and HG2 43.

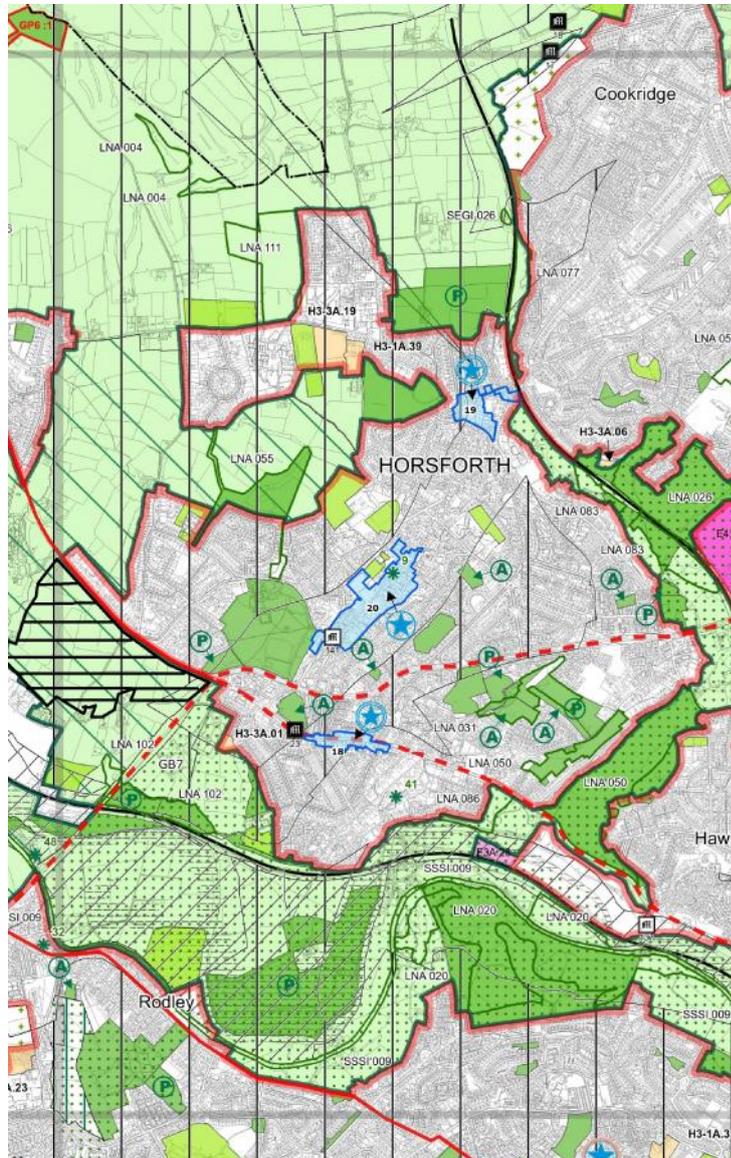
Response resulting from HTC Additional Site Allocation Questionnaire – summary attached.

1. 794 out of 1,007 respondents want to see site HG2 41 protected from development. A further 102 felt that this site is unsuitable for development. Therefore over 90% of respondents see the site as unsuitable for development or want it to be protected from development.
2. For site HG2 43, 589 out of 1,003 respondents want the green field part of the site to be protected from development. 179 respondents feel it is unsuitable for development. 76.8% of respondents therefore feel the green field part of the site is unsuitable or should be protected from development.
3. Respondents indicate that these sites overstretch infrastructure, consume green belt and will forever change Horsforth.
4. Horsforth Town Council notes sites originally within the 2012 Options and Issues consultation suggesting extensive available land within Roundhay of similar quality to that in Horsforth, which remains within the North Leeds housing character area. (See below for site information).
5. This very strong response from Horsforth residents indicates that they do not want development to take place on these green belt sites. HTC knows that there are alternative sites located in North Leeds. HTC therefore finds this aspect of the SAP unsound on the basis that the plan is not justified. Horsforth is being expected to take about one third of all of the proposed house numbers (over 2,000 out of 6,000 dwellings) in North Leeds. That is unreasonable when there are alternative sites elsewhere, as the Town Council has indicated.



Green Belt Use

Both sites HG2 41 and HG2 43 are in the green belt, the existing designation being indicated on the plan below, with the position of HG2 41 shown in black hatching. (Map extracted from: UDP 2006). Site HG2 43 is located in an area marked on the map below as GB 7 and both are in Leeds Nature Areas (LNAs).



HTC notes that SAP inclusion of site HG2 41 cuts off the green belt corridor that exists linking the west of Horsforth and the green belt located on the Horsforth and Rawdon boundary down into the River Aire valley. HTC finds that this is a severe interruption of the green belt corridor and allows the linking of two built up areas; the Clariant site to the south and the existing housing to the north of the A65, as well as the settlements of Horsforth and Rawdon.

The National Planning Policy Framework 2012 (NPPF), section 9, items 79 to 92 inclusive, has multiple paragraphs concerning green belt protection. Paragraph 80 specifically sets the five purposes of green belt all of which relate to site HG2 41. Testing HG2 41 SAP inclusion against these purposes indicates: -

1. Development of HG2 41 will allow the sprawl of large built-up areas.

2. Horsforth and Rawdon will tend to merge with each other (especially as there are additional housing sites proposed both on the boundary in Horsforth (HG1 96) and in Rawdon (HG3 2, 3, and 4 and HG2 12).
3. This significant part of Horsforth's countryside will be encroached.
4. The setting and character of Horsforth will not be preserved.
5. A site of this size and as green field will be chosen for development by developers over derelict and other urban land that exists in North Leeds, failing to assist urban regeneration.

HTC notes that paragraph 83 of NPPF states that established green belts should only be altered in "exceptional circumstances". Government ministers have repeatedly stated that need to fulfil housing targets is not an exceptional circumstance and that in all cases a brown field development policy should hold sway.

HTC therefore finds that the SAP for this site (and others indicated) is unsound as the plan is not consistent with national planning policy in respect of protecting green belt land.

The Cumulative Impact of Housing Development on Infrastructure

HTC notes that the following will all contribute most significantly to overstressing road and transport infrastructure in Horsforth, in relation to the A65 and A6120 Ring Road.

- ◆ c. 4,300 dwellings in Bradford linking to the A65
- ◆ More than 2,300 proposed dwellings for the Aireborough housing character area
- ◆ More than 2,000 dwellings proposed for Horsforth
- ◆ The prospect of an airport link road
- ◆ In excess of 1,000 dwellings already with outline planning permission at Kirkstall Forge
- ◆ Other sites close to these major arterial roads such as Moseley Wood Bottom, Woodside Quarry and Cookridge Hospital.

HTC understands that individually local infrastructure projects linked to the development of specific sites might provide limited mitigation in respect of improved road and transport infrastructure. However, it is the cumulative effect of these approximately 10,000 dwellings that will impact so severely on the ability of people to get through and around the town. The strategically located Horsforth roundabout is a massive pinch point and the focus for all this, as is the set of bridges across the River Aire and Leeds-Liverpool Canal on the A6120 Ring Road. HTC contends that overall the existing road framework cannot handle such huge imposition of additional load onto it and that in most cases existing road capacity cannot be increased without massive financial input. HTC feels that such a situation of cumulative effect on infrastructure can never be mitigated sufficiently locally.

HTC therefore feels that the SAP in this respect has not been positively prepared and fails to objectively assess the cumulative impact of development in Horsforth on infrastructure requirement for the future. The SAP is therefore unsound.

Site Allocation Plan and constraints placed on Neighbourhood Planning

Horsforth Town Council is developing a Neighbourhood Plan (NP) and has reached a critical stage in the process where the Aims, Vision and Policy Intentions of the proposed are shortly to be taken

out to Horsforth residents for open consultation. The document that has been approved by HTC is attached.

The purposes of the Core Strategy and SAP and the relationship between them was set by LCC when the Local Development Scheme was first prepared. This was well before the arrangements for neighbourhood planning were introduced by the government of the time.

LCC has chosen to amalgamate the consideration of (limited) green belt review and site allocation at the same time, thus excluding the former from local consideration via neighbourhood planning.

It is the Town Council's view that LCC should have taken account of the Inspector's advice in respect of the Core Strategy and carried out a full green belt review, from which it should have prepared the SAP. This could have been developed through closer liaison between LCC and HTC NP Working Group; and so could have been delegated to the neighbourhood planning process for Horsforth.

The Town council finds that the SAP preparation strategically has not supported the neighbourhood planning process and sustainable development in Horsforth; indeed has constrained it. This is not consistent with NPPF paragraph 185 and therefore we find the SAP to be unsound.

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For Horsforth Town Council
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