



FRIENDS OF WOODHOUSE MOOR



Sunday 3 April 2011

Dear Ms Palmer

**RE : APP/N4720/A/10/2140564, APP/N4720/A/10/2140572, APP/N4720/A/10/2140575,
APP/N4720/A/10/2140578, APP/N4720/A/10/2140587**

Thank you for sending us a copy of the Statement of Common Ground agreed between the Morley House Trust and Leeds City Council.

The Statement of Common Ground contains inaccuracies and misleading statements, and we object to these. We take issue with the Statement as follows :

Section 1

In the second paragraph, it is misleading to state that some of the tennis courts *have previously been utilised for car parking space*. It would be more accurate to state that they have *occasionally* been utilised for car parking space.

In the third paragraph, it is misleading to state that the site is located in an area of traditional housing *interspersed with more modern housing developments*. This wrongly gives the impression that there are large scale modern housing developments in the area. There is only the occasional modern house or block in the area, and none of these are adjacent to this site.

In the third paragraph, it is misleading to state that Woodhouse Moor is *a major city park*. Leeds City Council's website states that the city has seven major parks, and lists the seven parks. Woodhouse Moor is not included in that list.

Section 2

Referring to the Main School Building, the first paragraph says that *the later extension to this building . . . will be demolished*. This is misleading as the intention is to demolish the rear half of the original Main School Building completed in 1906.

Referring to the Main School Building, the first paragraph refers to it as both *the Senior School Building* and *the Main School Building*. This is misleading as it gives the incorrect impression that two different buildings are being referred to.

Referring to the Public Open Space to be provided, the second paragraph of the Statement claims that it would be *of value to residents*, and *open to other people*. But its relatively small size and its proximity to the proposed residences would mean that its value to residents would be greatly

diminished were other people to use it. Indeed, it could become a source of nuisance to residents were other people or even other residents to use it.

The sixth paragraph refers to *the retained Senior School Building*. It would be more accurate to refer to *the retained part of the Main School Building*. The statement as it stands gives the impression that the intention is to retain all the original Main School Building, when the intention is to demolish the rear half.

The seventh paragraph refers to the proposed Public Open Space as amenity space for both on-site residents and residents of the wider area. This strikes us as being wishful thinking which we do not share.

The second paragraph at the top of page 4 refers to *the conversion of the original Senior School Building into 32 apartments*. It would be less misleading to explain at this point that the proposed conversion involves demolition of the rear half of the original Main/Senior School Building. The second paragraph at the top of page 5 in stating that *the application is for the demolition of the modern extension to the Senior School Building*, gives the incorrect impression that the entire original Main/Senior School Building is to be retained. The intention is to demolish the rear 50% of this building.

The second last paragraph on page 5 states that the *proposed conversion of Rose Court to form 12 apartments is respectful of the building's current character and appearance*, and retains *all internal features worthy of retention*. We disagree with these statements.

The final paragraph on page 5 states that the conversion of Rose Court was recommended following consultation with the Council's Conservation Officer. This is very misleading. The Council's Conservation Officer stated that 12 apartments constituted over-development and recommended rejection of the application. The Council's Plans Panel only approved the application because they were not informed of the Conservation Officer's recommendations, and were incorrectly told by the planning officer, the same one who has signed this Statement of Common Ground on behalf of Leeds City Council, that there would be no loss of internal features, and no access road across the tennis courts.

Section 4

This section states that *the site is located within a sustainable location*, and that *the redevelopment of the site for residential use is considered acceptable in principle*. We do not agree that this is a sustainable location. The area's infrastructure is close to breaking point. Woodhouse Moor is the city's most intensively used park for a reason. The reason is lack of green space in the area in relation to population density. The area is already over-developed. That is why so many of the adjacent streets are now double parked in university term time. Neither do we agree that the redevelopment of the site's open space is acceptable in principle. This open space has N6 classification in the city's Unitary Development Plan, and is adjacent to an area classified N3.

Section 5

Paragraph 3 states that the tennis courts in the latter period of their use by the School, *were partially used as car parking rather than for tennis purposes*. This is not so. Satellite imagery from March 2008 shows all the courts being fully utilised as tennis courts with their nets in place. It may be true to state that the courts were *occasionally used as car parking*.

The first paragraph on page 8 states that the tennis courts are too small to be used as either a football, rugby, cricket or hockey pitch. This is misleading. The two tennis courts and the green

space in front of the Main School Building are large enough to be converted to a hockey pitch.

The second paragraph on page 8 states that 0.2 hectares is the minimum size for a playing pitch. We do not accept this. According to Sport England, there is no minimum size for a playing pitch.

Paragraph 4 on page 8 states that the facilities at Alwoodley Gate are sufficient to comply with Policy N6(i). We do not accept the interpretation of policy N6(i) that exempts these proposals from the requirement of policy N6(i) that replacement facilities be located in the same locality.

Paragraph 5 on page 8 is misleading when it states that *Sport England raise no objections to development of the site*. Sport England has an on-going non-statutory objection to all the proposals.

Section 6

We do not agree that what is being proposed will have *an acceptable impact* on existing or future residents in terms of privacy or any other amenity. Most of what is being proposed is only outline in form and so it is impossible at this stage to say what the affect will be on amenity. What is certain is that taken as a whole, the proposals represent over-development of the site.

Section 8

We do not agree that the proposed conversion of Rose Court is *acceptable and would have no adverse impact on the setting or fabric of the listed building*.

We object to the principle of conversion of the Main/Senior School Building to 32 flats.

Section 9

This section is misleading as it refers to an attached plan which it describes by reference to another plan "2006-239/601 Revision C." This other plan refers to the School Hall as a later addition to be demolished. We therefore do not accept either plan. Neither do we accept the statement which says "All of the demolition in the remaining hatched area is considered acceptable".

Section 10

We do not accept that *the development proposed will not have a detrimental impact on highways safety*.

Section 11

We do not accept that *development of the site cannot be directly attributed to any health problems in the area*.

Yours sincerely

Bill McKinnon
Chair