

Added congestion



Overwhelming local opposition



TATE ACTION GROUP
TAG



Gridlock on the bridge again



Does this look like brownfield to you?

TAG - THORP ARCH TRADING ESTATE ACTION GROUP OBJECTION TO PLANNING APPLICATION 16/05226/OT

Contact: Peter Locke, Chairman. 14 Thorp Arch Park, Thorp Arch, LS23 7AN

VOLUME 2

SUSTAINABILITY

**Objection to Planning Application 16/05226 for 874 dwellings etc.
Volume 2.**

**TAG objection to the Environmental Sustainability Statement by
AECOM.**

Preamble: It might have been useful if the statement had been prepared by an organisation with some knowledge of this area. Instead, it was prepared by AECOM in Basingstoke. Their ignorance is clear from the first page of their introduction, where, in section 1.1, they claim the site to be 2km to the South East of Wetherby. It is in fact 4.5km as the crow flies, and 5km by road from the proposed village centre to Wetherby Town Hall, in the middle of Wetherby market place.

Sustainability Case.

The Environmental Sustainability Statement attempts to demonstrate that the application complies with the three dimensions of sustainability. These elements are the 'golden thread' running through both plan-making and decision-taking.

As their petal diagram shows, a sustainable development has to meet the requirements of all three dimensions.

Below we will examine each in turn:

Economic role:

The test is supplying sufficient land in the **right place**, at the right time, and of the right type.

The Economic Benefits Statement by Pegasus (Appendix 1 to their planning statement) makes a case for the economic benefits of building out the planning application.

TAG does not dispute the economic benefits of house construction, but these benefits will arise **wherever the houses are built.**

The purpose of the current SAP process is to decide the best location for new housing in the Outer North East (and elsewhere). All the economic benefits will then arise. They are not site-specific.

The Outer North East has an almost complete absence of large employment sites. TATE has weathered the recession well, and is now home to significant levels of new build and refurbishment. The overall impression given is of a clean, attractive, well-managed facility. As such it should be retained for employment.

The applicant tries to make a case that the contamination on site makes it unviable for employment use. This is clearly nonsense, as can be seen from the new industrial developments being constructed to the east of street 5. The standards of decontamination for industrial use are significantly different from that for residential - fewer linkages and receptors are present - typically much or all of a fenced employment area will be hard-surfaced - the employees won't be growing vegetables, digging in their gardens, or playing

in the soil !!!! Unless any evidence is provided to compare the costs of decontamination for residential versus employment use then this objection should be totally ignored.

This location is clearly NOT in the right place for housing. From PPG3 onwards, it has been recognised that housing should be near to existing services and shops, well served by public transport and near good highways links. **None of these apply to this site.**

The Core Strategy has several passages covering **location for dwellings**:

Section 3.3 8. *Deliver housing growth in sustainable locations **related to the Settlement Hierarchy**, by **prioritising previously developed land in urban areas** and through the phased release of greenfield sites to ensure sufficiency of supply and provision of supporting infrastructure.*

Section 3.3 10. **Promote the role of town and local centres** as the heart of the community which provide a focus for shopping, leisure, economic development and community facilities, while supporting the role of the City Centre

Section 3.3 16. *Ensure new development takes place in locations that are or will be **accessible by a choice of means of transport, including walking, cycling, and public transport.***

4.1.4*This will ensure that the majority of growth is focused within the Main Urban Area, but that other **established settlements will also benefit from new development.***

4.1.6 *By concentrating growth **according to the Settlement Hierarchy**, development will occur in the most sustainable locations whilst respecting the overall pattern of development within the District.*

4.1.7*The Strategy directs growth of these facilities, to **locations within and on the edge of centres** and sets out proposals for meeting new shopping and other town centre uses. The hierarchy also ensures that **transport systems linking settlements will be strengthened** and investment delivers sustainable options to residents.*

4.1.8 *By ensuring that **development is linked to the existing Settlement Hierarchy**, it acknowledges the distinct role that each settlement plays within the overall make up of Leeds.*

SPATIAL POLICY 1: LOCATION OF DEVELOPMENT *To deliver the spatial development strategy **based on the Leeds settlement hierarchy***

.....

SPATIAL POLICY 7: DISTRIBUTION OF HOUSING LAND AND ALLOCATIONS *The distribution of housing land (excluding windfall) will be planned based on Tables 2 and 3.*

These tables show **total rural housing outside the settlement hierarchy of**

100 houses over the whole Leeds district. Putting almost 1000 dwellings on TATE would be a total anomaly.

*POLICY H8: HOUSING FOR INDEPENDENT LIVING.....
Sheltered and other housing schemes aimed at elderly or disabled people **should be located within easy walking distance of town or local centres or have good access to a range of local community facilities.***

*POLICY P9: COMMUNITY FACILITIES AND OTHER SERVICES Access to local community facilities and services, such as **education, training, places of worship, health, sport and recreation and community centres**, is important to the health and wellbeing of a neighbourhood.*

*5.4.3 Accessibility. A key element of accommodating an increased population whilst minimising traffic growth is to ensure that **new development is located in accessible locations that provide a real choice of sustainable transport alternatives.** Accessibility standards have been developed (based on the RS evidence base) that define the minimum standards that a new development will need to meet. The standards are set to ensure that all new development, including sites in rural areas and smaller settlements, **occurs in sustainable locations which are accessible to a range of key destinations.** Where these standards do not apply, investment will be required so that they can be achieved.*

*POLICY T2: ACCESSIBILITY REQUIREMENTS AND NEW DEVELOPMENT
New development should be located in accessible locations that are **adequately** served by existing or programmed highways, **by public transport***

Summary of Core Strategy position on location of dwellings:

- Must be in the Settlement Hierarchy
- Must have good highways and public transport links to a range of destinations
- Must meet the accessibility standards
- Must have access to good community facilities

A cursory inspection of the application reveals that it totally fails to comply. It is a new isolated settlement. With the exception of the primary school (only provided after 400 dwellings occupied) all the applicant is offering is to build **premises** which might house a few local services and a convenience store. They provide no evidence that the site would be able to sustain these businesses, even when fully developed. The proposal is far too small to be self-sustaining (the UDPR enquiry examined this, and concluded that even 1500 houses would not be sustainable. Figures of 5000 plus dwellings minimum were suggested). Public transport is effectively limited to the half-hourly 770/771 service. The journey times, and cost, to any major centre (Leeds or Harrogate) make it impractical for anything other than occasional trips.

Social role:

The test is to support strong, vibrant and healthy communities, with accessible local services to support health, social and cultural well-being.

This role is the reason why the Core Strategy has a settlement hierarchy. It is impossible to envision how an isolated new settlement, far below the size for any level of self-containment, can contribute anything to this objective. In particular, as the extract from Policy 8 above shows, it is even more unsuitable for sheltered accommodation, or people in care.

So this application completely fails the social dimension of sustainability.

Environmental Role:

The application makes much weight about preserving the historic significance of the site, and the areas of ecological importance. These are desirable outcomes, but no evidence is supplied to show that they cannot be achieved as well or better if the site remains in employment use. The ecological damage of the necessary 'confidence scrape' will be severe, the level of severity depending upon how much of the site will be scraped, which is a matter of dispute. TAG believe the guidance and current practice for residential occupation will require virtually the whole site to be 'scraped' into an ecological desert.

One of the main ways that development can contribute to protection of the environment is by minimising transport emissions - as recognised in the Core Strategy. On this score the site is extremely bad. The minimal public transport provision means, as the UDPR inspector found, that the community will be a car based one. Because of the site's location at the furthest point in the district from Leeds centre, and because it would attract a similar type of resident to Thorp Arch, distances travelled are likely to be great (see the Pegasus Planning Statement, appendix 3, table 2, showing where local residents work. Only 30% are even in the Wetherby district, the other 70% are at least as far as Leeds centre - 15 miles - and many even further.) Since the public transport is so poor, all the residents are likely to commute by car, with just a small percentage of the Wetherby ward destinations being accessed by other means.

This is definitely NOT a sustainable environmental proposition.

Summary

The applicant has drawn our attention to the three 'petals' of sustainability. As can be seen above, far from meeting all three requirements, this application fails them all.

So any presumption for sustainable development just does not apply.

This is no surprise, as the UDPR Inspector considered all above issues in the context of the review. He came to the identical conclusion:

“I conclude that in these circumstances the location is not, and has not been shown capable of being made, sufficiently sustainable to warrant residential development “

This was despite the UDPR proposition including improvements to bus services, including greater frequency and a new service to York and an fast 'executive' service to Leeds, car pools, and a transport interchange. It is worth studying the UDPR Inspector's report in detail. Very little has changed in either the local situation, or indeed in the guidance on what is required for sustainability for the subjects the Inspector addressed. This current application is significantly inferior on sustainability issues that the Inspector addressed. The situation is completely clear that this is **NOT A SUSTAINABLE SCHEME.**