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Making narrow pavements narrower

THORP ARCH GROUP
TAG

Gridlock at the COMPLEX again

Protected outdoor sport greenspace

THORP ARCH GROUP - TAG
OBJECTION TO PLANNING APPLICATION 17/07970/OT
Contact Peter Locke, Chairman, tagactiongroup@gmail.com

OBJECTION

Section 1

STRATEGIC OVERVIEW

TAG objection to planning application 17/07970/OT

Outline planning application for residential development with community facility. Land off Walton Road Walton Wetherby.

Introduction:

TAG is the acronym for Thorp Arch Group. TAG has a mandate from over 135 people to oppose this development on Planning Grounds. The Thorp Arch Parish Council also held a well attended open meeting for residents to discuss the application on 18 January. Opposition to the application was unanimous.

1.0 Executive summary:

1.0.1 There are many inadequacies with the proposed development. However, there are two main reasons for refusing planning permission for the proposed development. The first main reason is that TAG does not consider the site is in a location, which is, or can be made sustainable. This is the phrase used in the penultimate bullet point of paragraph 17 of the NPPF. In this objection, TAG use the phrase “sustainable location” as shorthand for the words used in the NPPF.

1.0.2 The second main issue, is that the proposal would be harmful as:

- **It falls in a location in what the development plan defines as greenspace outside the physical limits of the villages of either Thorp Arch, or Walton**
- **The development would be prejudice to open space provision**

1.0.3 The application should be refused for the following reason.

1.0.4 The development would result in the loss of both outdoor sport and amenity green space, and would not constitute sustainable development. The proposals would be contrary to policies H2, SP6 and T2 of the Core Strategy.

1.0.5 The headline issues outlined in this report are summarized as follows: -

- Unsustainable location – housing in this location would be distant from opportunities to undertake day-to-day activities. Growth patterns need to be managed to ensure best development of infrastructure such as transport and public services, which this application does not provide.
- Poor highways fed by two ‘pinch points’.
- Congestion at the Thorp Arch Bridge/Bridge Road/High Street T-junction - ‘the complex’ - is already severe and dangerous.
- It would be a car dominated dormitory community.
- The proposed Community Centre is not wanted at that location, and would damage the viability of the Walton Village Hall.
- Inadequate bus service, with very long journey times.
- No train service
- Walking/cycling accessibility - badly failing accessibility standards

- Unsupported by Leeds Core Strategy, local Parish Councils, Thorp Arch and Boston Spa neighbourhood plans.
- Overwhelming public opposition.
- Predominantly greenfield site, with protected playing pitches.
- No functional need in rural area.
- Determining this application before the SAP housing proposals are examined, and the TATE appeal outcome is known, would be premature.

Detailed Submission

1.1 SUSTAINABLE LOCATION

(i) Principles

1.1.1 There are three dimensions to sustainable development; economic, social and environmental. A sustainable location is not synonymous with a sustainable development but it contributes to all three dimensions; to the economic role by characterising land which is in the right place; to the social role through the provision of accessibility to local services; and to the environmental role by using natural resources in transport prudently, minimising waste and pollution.

1.1.2 One of the government's core planning principles is that planning should actively manage patterns of growth to make the fullest use of public transport, walking and cycling and focus significant development in locations, which are or can be made sustainable. This proposal is sufficiently significant to warrant Environmental Impact Assessment as

the cumulative impacts of **all** development has to be considered to comply with the EIA Regulations 2017. This development would significantly add to pressures on the local area as outlined in the Environmental Statement submitted to accompany application 16/05226/OUT, and Leeds City Council would be open to challenge if they were not to consider the impacts of **this** development should the appeal on the adjacent land for 874 houses and a 66 bed care home be allowed.

- 1.1.3** The principle is elaborated in the National Planning Policy Framework (NPPF). Recognising that circumstances vary depending on the nature and location of the site, paragraphs 29, 32, 34 and 38 advise that decisions should take account of whether the opportunities for sustainable transport modes have been taken up so as to reduce the need for major transport infrastructure and should ensure that developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes should be maximised. A mix of uses should be promoted in order to provide opportunities to undertake day-to-day activities including work on site and, where practical, key facilities such as primary schools and local shops should be located within walking distances of most properties.

(ii) Thorp Arch

- 1.1.4** The site is not allocated for housing under the housing policies of the saved Unitary Development Plan (Review). The 'Submission Version of the Site Allocations for the Outer North East' proposes to allocate this site (as part of a wider allocation) for housing. It is NOT a favoured site within the newly adopted Thorp Arch Neighbourhood Plan. The SAP is not adopted and can only be afforded limited weight. The Neighbourhood Plan is adopted and can be afforded full weight.

- 1.1.5** It is accepted that, nationally, housing in the right locations is required. It is also acknowledged that Leeds City Council is unable to demonstrate a 5 year housing land supply and it is considered to be consistently under-delivering. The key assessment in determining this application is therefore the extent to which weight can be attached to the policies of the existing and emerging Local Plan, in light of a shortfall in the 5 year housing land supply. The application needs to be considered against the relevant adopted policies. However, in the absence of a 5 year land supply, there also needs to be a balancing exercise within the parameters that there is a presumption in favour of granting permission, unless any adverse impacts would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF as a whole.
- 1.1.6** Having regard to relevant policies within the Adopted Core Strategy, it is noted that the Core Strategy was published after the NPPF, and was found to be sound. Accordingly, full weight can be attached to the distribution strategy for the appropriate location of development as set out in Core Strategy Spatial Policies SP1, SP6 and SP7.
- 1.1.7** Core Strategy Spatial Policy 1 (Location of development) sets out the Council's spatial development strategy based on the Leeds settlement hierarchy and seeks to concentrate the majority of new development within and adjacent to urban areas, taking advantage of existing services and high levels of accessibility. The hierarchy prioritises the location of future development and sets out those areas towards which development will be directed. Table 1 identifies settlement types in the hierarchy as being the Main Urban Area of Leeds, Major Settlements, Smaller Settlements, and finally Villages.
- 1.1.8** In application 16/03692/OT (Outline application (with all matters reserved) for residential development for up to 23

dwellings) it was suggested that Thorp Arch would fall in this latter category. There was a key omission however, in the consideration of that application. The site on Walton Road, although falling within the *Parish* of Thorp Arch, it does not fall within the *village*. It is very important that there is distinction here and that each application is considered on its merits. If one was to suggest that development is to be permitted wherever there is a nearby village, then the whole of Leeds District would be developable. Clearly, that is not in the spirit of the policies within the NPPF, however, it appears that that was how the adjacent site and application 16/ 03692/OT was considered. **This is clearly wrong.**

1.1.9 The SAP for the Outer North East proposes that the site is a delivered in later phases of the plan (Phase III). This has not been adopted and the site had been included on a flawed basis. Many of the issues which Leeds defended the appeal by Rockspring on the adjacent site for 874 houses are relevant to this proposal.

1.1.10 Spatial Policy 6 of the Core Strategy relates to the City's Housing Requirement and the allocation of housing land. It confirms that the provision of 70,000 (net) new dwellings will be accommodated between 2012 and 2028 with a target that at least 3,660 per year should be delivered from 2012/13 to the end of 2016/17. Guided by the Settlement Hierarchy, Spatial Policy 6 confirms that the Council will identify 66,000 dwellings (gross) (62,000 net) to achieve the distribution in tables H2 and H3 in Spatial Policy 7 (which identifies a need for 5000 new homes in the Outer North East Housing Market Character Area within which the site is located, representing 8% of the City-wide distribution) using the following considerations:

- (i) Sustainable locations (which meet standards of public transport accessibility), supported by existing or access

- to new local facilities and services, (including Educational and Health Infrastructure);
- (ii) Preference for brownfield and regeneration sites;
 - (iii) The least impact on Green Belt purposes;
 - (iv) Opportunities to reinforce or enhance the distinctiveness of existing neighbourhoods and quality of life of local communities through the design and standard of new homes;
 - (v) The need for realistic lead-in-times and build-out-rates for housing construction;
 - (vi) The least negative and most positive impacts on green infrastructure, green corridors, green space and nature conservation;
 - (vii) Generally avoiding or mitigating areas of flood risk.

1.1.11 It is noted that only last week on 7th February, Leeds City Council has agreed a new housing target that would be 'considerably lower' than the requirement adopted in its 2014 core strategy, but higher than the figure that would be generated by the government's proposed standardised method for assessing housing need.

1.1.12 It is noted that the council's planners had warned that use of the standard method could be 'damaging' to the city's economic growth prospects and ability to meet housing needs. However, this should not mean that development in sustainable location and place-shaping should be ignored.

1.1.13 Your own reports set out different scenarios. The first and lowest scenario, based on the government's proposed standard method, would set the housing requirement for Leeds up to 2028 at 42,000 new homes. The report said that this target "*would have the benefits of having an easily achievable five year supply figure and the least need for greenfield and green belt releases, but is not recommended because of concerns that too low a figure could be*

damaging to Leeds's economic growth prospects and ability to meet housing needs, especially for affordable housing".

1.1.14 The report also set out a "high growth" scenario of 60,500 homes to 2028. It said that this *"would be the most ambitious in terms of economic growth and ability to offer a wider choice of housing, including affordable housing but there are concerns that too optimistic a view of economic growth or similarly, of migration patterns, which then fail to materialise could lead to more land release for housing than is necessary"*.

1.1.15 Finally, your own department recommended that the council adopt a third scenario of 51,900 homes over the plan period. The report said that this level was *"considered to achieve the best balance between economic growth and safeguarding greenfield land (TAG's underlining)"*.

1.1.16 *"It is robustly based on evidence of the strategic housing market assessment (SHMA) which takes full account of employment and migration patterns"*, the report said.

1.1.17 The proposed new housing target will now go out for public consultation and it would be inappropriate to approve a development that is not sustainable on a greenfield site, in light of these newly proposed figures.

1.1.18 The proposal does **NOT** comply with the criteria contained within Spatial Policy 6 of the Core Strategy for the following reasons: -

- (i) The proposed development fails criteria (i) as it is **NOT** supported by existing or have access to new local facilities and services and will be heavily car dependent
- (ii) It is **NOT** on a brownfield or regeneration site

- (iii) The site does not fall within the Green Belt, so this is not relevant
- (iv) Although the proposed development is in outline form and the submitted plans are indicative, the location is **NOT** one that would allow for opportunities to reinforce or enhance the distinctiveness of existing neighbourhoods and the quality of life of the local community.
- (v) Should outline consent be granted, Homes England would then need to sell the site to a developer. The developer would then need to secure a reserved matters consent. Theoretically, it could take up to 3 years to build out the development, so we are possibly looking at 5 years to completion of the development. However, this does not take into account what the build out rates would be if the Rockspring application granted consent by the Secretary of State, as permission on that site would **significantly reduce the build out rate.**
- (vi) The proposed development is not on a brownfield site, it is on a green field. It would have a negative impact and result in a loss of green space. The developer has not included any measures for positive impact to green infrastructure, therefore the proposal does **NOT** comply with this criteria.
- (vii) The site does not fall within a Flood Risk area. However, there have been reports of localised flooding in the area and that floating sewage was a particular issue raised when the application proposal for 23 houses on the adjacent site was considered.

1.1.19 In terms of a sustainable location (SP6 (i)), the site does not sufficiently meet the Accessibility Standards established at Table 2, Appendix 3 of the Core Strategy. This weighs strongly against the grant of planning permission. With regard to access to facilities and services, including education and health infrastructure, the matter of education

would be addressed through the Community Infrastructure Levy (CIL). The Adopted Regulation 123 List advises that CIL can be gathered for primary education, except for large scale residential development identified in the Site Allocations Plan, which will be expected to provide primary schools either as an integral part of the development or as the result of no more than 5 separate planning obligations. This application does not fall within the category of being identified for on-site provision, however, it is a large-scale major site, especially when considered alongside the potential Rocksping development at TATE. This is a solely car dependent proposal when it comes to considering how children will be got to and from school.

1.1.20 Similarly, there is no easy access to shops or other facilities.

1.1.21 The supporting text in the Core Strategy paragraph 4.1.13, states that, in rural areas outside the settlement hierarchy " *Development will only be permitted if it functionally requires a rural location*". There is no functional need. Local requirements have already been catered for, in proportion to the community size, in the neighbourhood plan, and with the 23 house scheme to the south of this site.

1.1.22 The proposal fails on criteria (ii) and (vi). How can a sizeable development of 142 dwellings in total (119+23) be argued to reinforce or enhance the distinctiveness of an existing neighbourhood, when it is so far away from the actual village? Development on this site would overwhelm the existing community and effectively provide a split to the community and go against the social sustainability aims of the NPPF.

1.1.23 **It is concluded that the development does NOT accord with Core Strategy Policy SP6.**

1.1.24 Core Strategy Policy H2 states that new housing development will be acceptable in principle on non-allocated land, providing that the number of dwellings does not exceed the capacity of local infrastructure and that for developments of more than 5 dwellings the location accords with the Accessibility Standards in Table 2 of Annex 3. Under policy H2 greenfield land should not be developed if it has intrinsic value as amenity space or for recreation or for nature conservation, or makes a valuable contribution to the visual, historic and/or spatial character of an area.

1.1.25 Although adjacent to a prison and a relatively modern housing estate opposite, the site is a greenfield site set within a rural landscape. The site does make a valuable contribution to the spatial character of the area and does **NOT** meet any of the Core Strategy Accessibility Standards contained within Table 2 of Annex 3. A development of this scale cannot be found to be acceptable purely on the basis of a having a bus route (with only 2 buses per hour) located 200m away.

1.1.26 It is accepted that the site has limited nature conservation value, however, it is clearly suitable for outdoor recreation, as that is how the land has been used for many years. The site has not been identified as being surplus to requirements in the Open Space, Sport and Recreation Assessment. In fact, the Open Space, Sport and Recreation Assessment states that the Leeds North East Outer area is deficient and therefore, this site should be retained.

1.1.27 The NPPF at paragraph 74 states:

Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- *an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
- *the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
- *the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.*

1.1.28 Since none of these requirements has been met, the loss of the green space and sports pitches should not be allowed.

1.1.29 **It is concluded that the development does NOT accord with Core Strategy Policy H2.**

1.1.30 The Thorp Arch Neighbourhood Plan does not support the larger site HG2-227 for housing. After the required local consultation exercises, there was no local need identified for any additional housing in excess of that approved in the plan.

1.1.31 The application site forms part of a 6.33 hectares Phase 3 housing site, as described under site reference HG2-227 of the SAP for the Outer North East, which has a stated capacity of 142 units. However, the submission has not however been examined and **cannot therefore be given significant weight at this point in time.** Both TAG and Thorp Arch Parish Council object to the site inclusion within the SAP and have made representations through the Local Plan process. The allocation is also contrary to the newly adopted Thorp Arch Neighbourhood Plan and there is every likelihood that the site will **not** be required for development, due to the lowered housing figure in light of Leeds City Councils statement that it would be inappropriate to

approve a development that is not sustainable on a greenfield site.

1.1.32 The site is allocated as greenspace. It does **NOT** fall to be considered as unallocated land within the lowest tier of the settlement hierarchy as although the site falls within the Parish of Thorp Arch, it does **NOT** fall within the confines, or sit adjacent to the actual village of Thorp Arch, therefore, it would be incorrect to use the settlement hierarchy to justify approval of development in this location. The SAP has not been examined and cannot therefore be given any significant weight. This is a proposal for a relatively **LARGE SCALE** housing development of up to 119 dwellings (142 when adding in the 23 dwellings already approved on the adjacent land). The proposal constitutes greenfield development, which is not favoured by the principles contained within the Core Strategy, and is highly car dependent and conflicts with Core Strategy policy H2. The site would deliver policy compliant on-site affordable housing however, it is not considered that this is significant enough to overcome the harm.

1.1.33 That said, the draft plan site assessment concludes that the site is part of an area of vacant land that is situated between existing residential development and Thorp Arch Trading Estate, a small part of which is brownfield containing derelict buildings and which is located within an urbanised setting outside of the Green Belt. The brownfield portion referred to is not within this application, which is all greenfield.

(iii) The Site

1.1.34 As part of a former Royal Ordnance Filling Factory, (ROFF), the site was chosen to be remote from habitation, and away from large roads, in order to be less easy to identify from the air.

- 1.1.35** The site is at the furthest point of Leeds district boundary, with a round trip distance to Leeds City centre of about 30 miles.
- 1.1.36** The site is separated from all destinations in the Leeds area by the A1(M) running north/south, and by the River Wharfe, running approximately east/west. The only practical routes to Leeds area destinations (without a very large detour) are either via the single track bridge linking Thorp Arch to Boston Spa, or via the roundabout on the Walton-Wetherby road (situated on the local access road which runs alongside, and to the west of, the A1(M)). Both of these access routes are already showing significant traffic queuing at peak hours.
- 1.1.37** Little provision has been made to enhance links with the actual village of Thorp Arch. The table of local facilities provided by the developer demonstrates a total lack of understanding of the local area and questions whether its author has actually visited that site. For example, the table refers to the British Library as providing an amenity to local people. The British Library is effectively a storage facility and is not open to the public, so can hardly be described as being of amenity value. The only facilities that are within walking distance are a pub, church and village hall in Walton. There are no facilities within the village of Thorp Arch which would be within a desirable walking distance of the site. All visits to schools and shops would be car dependent. Most of the listed facilities would exceed even the preferred maximum walking distance using the commonly accepted Guidelines for Providing for Journeys on Foot of the Institution of Highways and Transportation.
- 1.1.38** Of course, walking distances are not the only yardstick by which to judge a sustainable location. NPPF paragraph 38 seeks opportunities to undertake day- to-day activities on

site. NPPF paragraph 34 advises that developments generating significant movement should be located where the need to travel can be minimised and the use of sustainable transport modes can be maximised. These are defined in NPPF Annex 2 as including walking and cycling, low and ultra-low emission vehicles, car sharing and public transport.

1.1.39 There is no indication at this outline stage that the scheme would offer particular encouragement to ultra-low emission vehicles such as through the provision of electrical vehicle charging points, though such could probably be required through condition when details are submitted at reserved matters stage.

1.1.40 Although there are some footpaths and cycle routes close by, these are not usable in winter months due to poor surfaces, lack of lighting and they are largely not attractive to cyclists throughout the whole year. Cycling does not appeal to all and not all the facilities in the applicants list would all be within reasonable cycling distance. It is also noted that, not all day-to-day requirements are in the applicants list.

Conflict with Leeds Core Strategy Policy T2:

1.1.41 The Core Strategy policy T2 states *“New development should be located in accessible locations that are adequately served by existing or programmed highways, by public transport and with safe and secure access for pedestrians, cyclists and people with impaired mobility.”*

1.1.42 It is plain from the above that the proposed development is diametrically opposed to this policy. Although the access to the site for pedestrians is good in that there are footpaths, some recently renovated, there are no services near enough to walk to for everyday requirements.

1.1.43 The application refers to the adjacent cycle route 665. It runs from Wetherby to Thorp Arch Trading Estate so passes near the site. It may soon be extended over the river Wharfe. As said above, this is an excellent, fine weather, leisure facility. It is completely unsuited to all-year use for commuting or shopping. It has no lighting, and passes through dense overhanging vegetation in many places. In winter it gets icy, and is not gritted. In autumn it is covered in leaves which hide where the hard surface edges end, and the soft unconsolidated earth begins, into which bike wheels sink. There is currently almost no commuting use of the route (either on bike or on foot), and no reason to expect any change in this.

1.1.44 It is concluded that the development does NOT accord with Core Strategy Policy T2.

1.1.45 It is concluded therefore that the general acceptance of the applicant that the site would be in a sustainable location is misleading. In consequence this proposal would result in a degree of harm to all three elements of sustainable development if permission were granted. It would be contrary to Local Plan policies that seek to protect green space and would be contrary to Core Strategy policies SP1, SP6 and H2, which seek to relate new housing development to be accessible to services, transport and infrastructure and to reduce the overall need to travel and which seeks to distribute land for new homes in accordance with the Settlement Hierarchy drawn up on the principles of sustainable development.

Effect on countryside

1.1.46 This is a site which has no other planning or landscaping designation. It is not marked as countryside out of the

ordinary. There is no suggestion that it is a valued landscape. There are no known issues for ecology. Although it is allocated as Green Space in the adopted Local Plan, it is not the highest quality and most versatile in terms of its contribution.

1.1.47 Government policy, set out in NPPF paragraph 17 bullet 8 and in paragraph 111, is that planning should encourage the effective use of land by reusing land that has been previously developed. This is a greenfield site and so its development would not align with that government preference and would transform its character and appearance from an undeveloped to a developed area.

Housing Land Supply

1.1.48 Any housing development is of benefit as government advice in the NPPF repeatedly makes clear. The provision of 35% of the dwellings proposed in this case as affordable housing accentuates that benefit. The issue in this particular case is whether those benefits would be of even greater significance in the light of the Council's housing land supply position.

1.1.49 Paragraph 47 of the NPPF sets out five bullet points advising what local authorities should do to boost significantly the supply of housing. The first bullet point is to ensure that the Local Plan meets the full objectively assessed needs (OAN) for market and affordable housing in the housing market area.

1.1.50 Given the decrease in the housing target figures released by Leeds City Council on 7th February 2018, the SAP is clearly out of date and should be updated and it is likely that sites such as the HG2-227 which is in an unsustainable location and on a greenfield site shall be withdrawn and will not meet the tests of the examination.

1.2 Highways

- 1.2.1 The local road network is not resilient. The June 15, 2016 fatal accident on the A1(M) demonstrated the problem. The local network completely grid-locked (not surprising, it can't be expected to cope with the complete closure of the A1(M)). However it remained grid-locked for over two hours after the A1(M) was running freely.
- 1.2.2 The bridge/Bridge Road/A659 junction acts as one complex traffic system. It is not amenable to modelling, because of the unusual and multiple obstacles to traffic flow. With on-street parking (required by Boston Spa residents) it is effectively a 250m long "single track road with passing places" - the passing places being the very limited gaps between the parked cars. A characteristic of such roads is that once traffic volumes reach a critical level, the "passing places" no longer have the capacity to cope, and the system grid-locks. To make matters worse, the junction with the A659 has very tight turning radii.
- 1.2.3 Visibility for the full length of the single track section is very limited, and sometimes completely obscured. It is therefore very difficult for a driver to assess whether to enter the single track section of road. This would apply even more strongly were the mitigation 'two-way' widening of Bridge Road undertaken.
- 1.2.4 Additionally, the vulnerability of old bridges was demonstrated by flooding at the turn of the year 2015/16, which closed both Tadcaster and Linton bridges over the Wharfe. If the same happened to Thorp Arch Bridge that would leave the area with only one, overloaded and congested, point of access.

1.2.5 Clearly the local highways network is unsuitable for the addition of the traffic generated by the proposed development.

1.3 Public Transport

1.3.1 Public Transport is totally inadequate for a site of this size and location. The 70/71 is the only all-day service. It runs at half-hourly intervals to Leeds or to Harrogate via Wetherby. The journey times are over 1 hour to Leeds, and about 40 minutes to Harrogate. It is also very expensive, with a return ticket to Harrogate costing £7.

1.3.2 There is no local train station, with the nearest station for Leeds being at Garforth, 12 miles away.

1.4 Accessibility/Facilities

1.4.1 The site fails all the accessibility criteria in the Leeds Core Strategy appendix 3, by a factor of 2 or more.

1.4.2 The site has virtually no 'everyday needs' facilities within a 2km walking distance. It is also distant from primary medical care (already overloaded in Boston Spa) and schooling.

1.4.3 The neighbouring small settlement of Boston Spa has a range of local services, but it is 2450m distant by foot, including a steep descent and ascent at the bridge, and a very narrow and unpleasant/dangerous footway on the bridge.

1.4.4 The proposed Village Hall is remote from Thorp Arch village and has limited parking. The current residents in the area, such as Woodlands and Walton Chase, use the Walton Village Hall for functions. Putting a second hall in this location would seriously undermine the viability of Walton Village Hall.

Leeds 'Aspiration'

- 1.4.5 LCC's aspiration is to be the best city in the UK to live and work (launch of the Core Strategy, Councillor Keith Wakefield, 12/11/2014). How is this served by developing a new settlement, which has easier access to both Harrogate and York by car?
- 1.4.6 With the high level of house prices in the area, residents are mainly in senior professional jobs, and some use the proximity to the A1(M) to commute as far as Manchester, Darlington and Halifax. Shopping trips, too, are often made to destinations other than Leeds Centre. This location would not support the aspiration.
- 1.4.7 Even the site assessment makes it clear that the location is very poor for accessibility and public transport. It does say that site 1055 (TATE) could assist in providing facilities, but the development of this site is subject to the Appeal, so has no weight until the result of the Appeal is known. The assessment also claims that the site is in an urbanised setting. Since 'urban' is defined as 'relating to cities' and this site is in a rural area this is obviously nonsense.

Localism

- 1.4.8 The NPPF says that planning should:

"be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area."

It is clear from the responses to the SAP that local people are strongly opposed to any housing development on this site. In addition, the Thorp Arch Parish Council (TAPC) held a meeting on 18 January 2018 with over 60 local people attending, plus local Ward Councillors and neighbouring

Parish Council chairmen. Despite TAPC providing a 'neutral' summary of the benefits and disbenefits of the proposal, there was 100% opposition to it at the final show of hands. Also our Thorp Arch Group has approached the community for a mandate to oppose this application, with over 135 people registering.

- 1.4.9 It does not comply with the newly adopted Thorp Arch Neighbourhood Plan, and the highways implications, in particular, conflict with the Boston Spa Neighbourhood Plan.

Prematurity

- 1.4.10 The recent Appeal by Rockspring for planning application 16/05226, for 874 houses and a 66 bed care home, relates to Thorp Arch Trading Estate (TATE). This is adjacent to this site, which was also a part of the original Royal Ordnance factory. This Appeal is yet to be decided. If it were approved, it would result in a very significant increase in local traffic. LCC opposed the Appeal, largely on the grounds that the highways network was incapable of supporting the resulting traffic volumes. How can it be possible to consider adding an extra 119 houses when this Appeal is undecided?

- 1.4.11 In the original SAP discussions, based on the 'Issues and Options' consultation of 2013, this site was NOT proposed for housing. A small part of site HG2-227, which is now the subject of an approved planning application for 23 houses, WAS considered in the proposals as SHLAA site 4055. It was REJECTED - 'sieved out' - as per the policy requirements, despite being brownfield.

- 1.4.12 This site is the remaining part of HG2-227. It is greenfield. It was only introduced into the SAP at the ONE (Outer North East) revision stage. It is the subject of considerable

objections. It does not comply with Core Strategy policies, SP1, SP6, and T2, amongst others. Under these circumstances the inclusion of HG2-227 in the submission version of the SAP has virtually NO WEIGHT in planning terms. The housing portion of the SAP will not be examined until mid 2018.

1.4.13 To decide this application before the SAP is examined would be totally improper and premature.

1.5 CONCLUSIONS

- 1.5.1 In accordance with Para. 49 of the NPPF the proposal is considered in the context of the presumption in favour of sustainable development. In the absence of a 5 years supply of housing the “tilted balance” in Para. 14 applies, of granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies of the NPPF.
- 1.5.2 There are clear substantive adverse impacts arising in terms of social and environmental issues which significantly and demonstrably outweigh the benefits of the proposal such that it does not represent sustainable development. This is a material consideration which weighs against the proposed development.
- 1.5.3 The proposal also would not accord with the development plan.
- 1.5.4 There are consequentially no material considerations of sufficient weight to warrant the planning permission being granted.
- 1.5.5 This application proposed development on a greenfield site and would result in development in a location which is not sustainable, or could be made sustainable.

1.5.6 Other benefits claimed by the applicant are mitigations of harm rather than positive enhancements to be weighed in the development's favour. Moreover, close consideration of the points made in this submission reveal that this site would not be in a sustainable location because it is distant from opportunities to undertake day-to-day activities and the development itself would not remedy that.

1.5.7 Important though the provision of housing is, it is also important that patterns of growth are actively managed to make the fullest possible use of public transport, walking and cycling and to focus significant development in locations, which are, or can be made, sustainable. It is acknowledged that the Council has included this site within its emerging SAP for development. However, TAG are confident that when it comes to being examined it will be concluded that the allocation does **NOT** accord with the government's principles for sustainable development. This particular proposal does not and so, **the application should be refused.**