

From: [REDACTED]
To: [Site Allocations Plan](#)
Cc: [REDACTED]
Subject: PDE02615_Fwd: SAP
Date: 16 November 2015 16:25:57
Attachments: [2015 SITE ALLOCATION FINAL COMMENTS NOVEMBER 16.docx](#)

-----Original Message-----

From: dotandbilly <[REDACTED]>
To: billy.flynn <[REDACTED]>
Sent: Mon, 16 Nov 2015 16:11
Subject: Fwd: SAP

I spoke to someone in Planning this morning to report that the council website closed down yesterday preventing access to the SAP and Core Strategy documents. The return by time for comments was subsequently extended by two hours today.

Because of the website issues I was unable to complete the comments form online and had to use a Word document. Unfortunately there appears to a problem with the council IT system as I am unable to send the word doc to my iPad in word format despite numerous attempts over the past two hours. It appears to be attached now but just in case I have appended the comments to this email below. This has affected the format and I should be grateful if you could convert it back to Word showing the 7 sets of comments as separate responses to 7 sites in Adel and Wharfedale Ward if the Word doc attachment goes missing in transit.

I should be grateful if you would let me know if it arrives ok and please let me know asap if there are any issues with my submission.

Cllr Billy Flynn

Comments on Site Allocations Plan

Part 1 Details

Mr
Billy
Flynn
Leeds City Councillor
Leeds City Councillor - Ward councillor
31 East Causeway Vale
Adel
Leeds
Ls16 8LG
Home - [REDACTED]
[REDACTED]

Part 2 Comments

Site Designation Ref: HG2-18 (2130) Church Lane, Adel

I do not agree with the proposed use of this site – see para 3.3 below

Part 3 Soundness of plan

3.1 I do not consider the plan to be sound

3.2 - I do not consider the plan to be sound as it fails to meet a number of the conditions laid out in the Core Strategy and NPPF. The proposed Site Allocations are unsound generally because they fail to comply with Para. 158 of the NPPF which requires 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”. The estimate of population growth in the Core Strategy was apparently based on figures from 2008. The most recent census indicated that population growth was actually some 43% less than expected. The Core Strategy and hence the Site Allocations Plan is therefore based on inadequate and outdated evidence and unsound. The 2011 Census figure showed Leeds had a population in 2011 of 751,500; The Core Strategy document uses inaccurate figures for the population in 2010 further indicating the figures are inadequate and out of date and that the council has failed to monitor the figures as it said it would or failed to take heed of reports which indicated a need for only 50,000-60,000 new houses.

This land was taken quite unnecessarily from the Green Belt land and re-designated as Green Field and contravenes many of the conditions of the NPPF covering the protection of the Green Belt. The fundamental aim of the Green Belt is to keep land permanently open. The essential characteristics of the Green Belt are their openness and permanence amongst other things to check unrestricted sprawl of large built up areas and to safeguard the countryside from encroachment. The site allocation plan fails this test in almost every respect.

The plans for this site fail to comply with Para 3.3 of the Core Strategy, objectives 8,11,17 and 21 refer.

3.3 I wish to comment on grounds of Conservation/Heritage: Highways/Transport : Local services/facilities : Loss of Greenbelt

Conservation/Heritage – Areas of Adel are contained within a conservation area. The addition of additional dwellings in this area on the edge of Adel will contribute to urban sprawl and will impact adversely on the character of Adel.

This site is in close proximity to Adel St John, a church dating back to the 12th century. English Heritage has registered considerable concern about any development in the vicinity of the church which would detract from the visual amenity on the approach to this magnificent, historic building, particularly looking from the west, where these dwellings are planned.

Highways/Transport – The current problems with over-capacity in highways and transport have been recognised by the council and so far as the latter is concerned, much (from the council's perspective) depends on the council's plans to introduce a New Generation Transport, a trolley bus scheme. We are currently awaiting the result of a Public Inquiry with no guarantee of success for the council and given the parlous economic situation nationally the release of some £75million of government money to part finance the plan is unlikely. Residents in the area do not feel that NGT will solve transport issues, in fact we think it will add to them by reducing the frequency of buses serving Adel. The NGT terminus is about a mile away from this site and if the bid for NGT is successful more dwellings will mean additional traffic on the already saturated A660 to the park and ride point. Traffic is already being channelled onto parallel minor roads, never designed for the level of traffic they are now carrying. Plans in the site allocation document for thousands of extra dwellings north, east and west of Adel will inevitably lead to additional pressure on the A660 and minor roads causing chaos.

Local services/facilities – Additional dwellings will have an impact on local primary care facilities, notably GP practices, schools and local shops. Local primary schools are at capacity with no firm plans for new schools. 2014 and 2015 first year of entry to primary schools in the north of the city were far in excess of what the council had expected or

planned for and resulted in emergency measures having to be introduced. The council has not demonstrated how these shortcomings will be addressed.

Greenbelt - The council has not demonstrated any exceptional or very special circumstances justifying encroachment on to the greenbelt particularly as brownfield sites are available nearby with no plans to develop them. The council has not demonstrated any change in circumstances that makes this exceptional measure necessary.

Part 4

I do not consider the site allocation plan is legally compliant in respect of the LDS, Statement of Community Involvement, Sustainability Appraisal Report and the T&C Planning Regs as follows:

The plan has not been prepared in accordance with the LDS as detailed above

The council held only very limited consultation, a handful of exercises out in the community. The council website containing the SAP and Core Strategy documents is not accessible by tablet or many other devices, they are too big. PCs, unless powerful, also have difficulty accessing the documents and access is very slow. Residents without access to the internet have no information to research. The council shut down their website on 15 November for maintenance thereby preventing residents from accessing any documentation and the comments form.

The site is not compatible with the T&C Planning Act for the reasons outlined above.

The site is clearly not sustainable as detailed above.

They are not in accordance with the Core Strategy as detailed above

Part 5

5.1 No

5.2 No

**W P Flynn
Councillor Adel & Wharfedale Ward
15 November 2015**

SITE ALLOCATION PLAN COMMENTS

Part 1 Details

Mr
Billy
Flynn
Leeds City Councillor
Leeds City Councillor - Ward councillor
31 East Causeway Vale
Adel
Leeds

Part 2 Comments

Site Designation Ref: HG2-38 (1178a) Dunstarn Lane, Adel

I do not agree with the proposed use of this site – see para 3.3 below

Part 3 Soundness of plan

3.1 I do not consider the plan to be sound

3.2 - I do not consider the plan to be sound as it fails to meet a number of the conditions laid out in the Core Strategy and NPPF. The proposed Site Allocations are unsound generally because they fail to comply with Para. 158 of the NPPF which requires 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”. The estimate of population growth in the Core Strategy was apparently based on figures from 2008. The most recent census indicated that population growth was actually some 43% less than expected. The Core Strategy and hence the Site Allocations Plan is therefore based on inadequate and outdated evidence and unsound. The 2011 Census figure showed Leeds had a population in 2011 of 751,500; The Core Strategy document uses inaccurate figures for the population in 2010 further indicating the figures are inadequate and out of date and that the council has failed to monitor the figures as it said it would or failed to take heed of reports which indicated a need for only 50,000-60,000 new houses.

This land was taken quite unnecessarily from the Green Belt land and re-designated as Green Field and contravenes many of the conditions of the NPPF covering the protection of the Green Belt. The fundamental aim of the Green Belt is to keep land permanently open. The essential characteristics of the Green Belt are their openness and permanence amongst other things to check unrestricted sprawl of large built up areas and to safeguard the countryside from encroachment. The site allocation plan fails this test in almost every respect.

3.3 I wish to comment on grounds of Conservation/Heritage:
Highways/Transport : Local services/facilities : Loss of Greenbelt
Conservation/Heritage – Parts of Adel are within a conservation area. The addition of additional dwellings in this area will contribute to urban sprawl and will impact adversely on the character of Adel.
Highways/Transport – The current problems with over-capacity in highways and transport have been recognised by the council and so far as the latter is concerned, much (from the council’s perspective) depends on the council’s plans to introduce a New Generation Transport, a trolley bus scheme. We are currently awaiting the result of a Public Inquiry with no guarantee of success for the council and given the parlous economic

situation nationally the release of some £75million of government money to part finance the plan is unlikely. Residents in the area do not feel that NGT will solve transport issues, in fact we think it will add to them by reducing the frequency of buses serving Adel. The NGT terminus is about a mile away from this site and if the bid for NGT is successful more dwellings will mean additional traffic on the already saturated A660 to the park and ride point. Traffic is already being channelled onto parallel minor roads, one of which has a junction with Dunstarn Lane, never designed for the level of traffic they are now carrying. Plans in the site allocation document for thousands of extra dwellings north, east and west of Adel will inevitably lead to additional pressure on the A660 and minor roads causing chaos.

Local services/facilities – Additional dwellings will have an impact on local primary care facilities, notably GP practices, schools and local shops. Local primary schools are at capacity, particularly on the south side of the A660 where this site is located with no firm plans for new schools. 2014 and 2015 first year of entry to primary schools in the north of the city were far in excess of what the council had expected or planned for and resulted in emergency measures having to be introduced. The council has not demonstrated how these shortcomings will be addressed.

Greenbelt - The council has not demonstrated any exceptional or very special circumstances justifying encroachment on to the greenbelt particularly as brownfield sites are available nearby with no plans to develop them. The council has not demonstrated any change in circumstances that makes this exceptional measure necessary.

Part 4

I do not consider the site allocation plan is legally compliant in respect of the LDS, Statement of Community Involvement, Sustainability Appraisal Report and the T&C Planning Regs as follows:

The plan has not been prepared in accordance with the LDS as detailed above

The council held only very limited consultation, a handful of exercises out in the community. The council website containing the SAP and Core Strategy documents is not accessible by tablet or many other devices, they are too big. PCs, unless powerful, also have difficulty accessing the documents and access is very slow. Residents without access to the internet have no information to research. The council shut down their website on 15 November for maintenance thereby preventing residents from accessing any documentation and the comments form.

The sites are not compatible with the T&C Planning Act for the reasons outlined above,

The site is clearly not sustainable as detailed above.

They are not in accordance with the Core Strategy as detailed above and as follows. In particular, the plans for this site fail to comply with Para 3.3 of the Core Strategy, objectives 8,11,17 and 21 refer.

Part 5

5.1 No

5.2 No

HG234 (4233)

I support the decision to include this site because it is a brownfield site so long as my overall objections to the excessive number of houses in the plan are taken into account and that the site is used for elderly housing.

**W P Flynn
Councillor Adel & Wharfedale Ward
15 November 2015**

SITE ALLOCATIONS – COMMENTS

Part 1 Details

Mr
Billy
Flynn
Leeds City Councillor
Leeds City Councillor - Ward councillor
31 East Causeway Vale
Adel
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Ls16 8LG
Home - [REDACTED]
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Part 2 Comments

PLANNING - Please note that the council website was closed down on Sunday, 15 November for routine maintenance preventing access to any of the documentation relating to the SAP. Because I had no access to the online comments form I put my comments on this word document. I contacted Planning on 16 November who agreed that, in the circumstances, I could include all three of the planned sites for Bramhope in the following comments. I have made clear in bold type which of the comments are specific to one particular site.

I wish to comment on the Leeds Site Allocation Plan. The comments refer to all three of the Bramhope sites

Site Designation Ref: HG2-15 (3400) Green Acres & Equestrian Centre,
LS16
Site Designation Ref : HG2-16 (1002) Creskeld Lane, Bramhope
Site Designation Ref : HG-17 (1080-3367A) Breary Lane East,
Bramhope

I do not agree with the proposed use of these sites – see para 3.3 below

Part 3 Soundness of plan

3.1 I do not consider the plan to be sound

3.2 - I do not consider the plan to be sound as it fails to meet a number of

the conditions laid out in the Core Strategy and NPPF. This refers to all the sites in this submission. The proposed Site Allocations are unsound generally because they fail to comply with Para. 158 of the NPPF which requires 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”. The estimate of population growth in the Core Strategy was apparently based on figures from 2008. The most recent census indicated that population growth was actually some 43% less than expected. The Core Strategy and hence the Site Allocations Plan is therefore based on inadequate and outdated evidence and unsound. The 2011 Census figure showed Leeds had a population in 2011 of 751,500; The Core Strategy document uses inaccurate figures for the population in 2010 further indicating the figures are inadequate and out of date and that the council has failed to monitor the figures as it said it would or failed to take heed of reports which indicated a need for only 50,000-60,000 new houses.

Bramhope has a population consisting of 3,400 out of a total population of 85,500 for Leeds Outer North West (4%) yet the Site Allocation Plans provide for the allocation of 449 houses out of the total allocation for Leeds Outer North West of 2,000 (22.5%). This impact on a town identified as a smaller settlement is disproportionate, unjustified and not in accordance with the Core Strategy in a number of respects:

The Breary Lane East Site (**HG-17 (1080-3367A)**) in particular would not be a sustainable development as it would impact dramatically on the local environment because of its scale and is unlikely to be able to be achieved in line with the requirements of Para4.1.13 of the Core Strategy;

The proposed allocation for the Breary Lane East Site (**HG-17 (1080-3367A)**) would have a very negative effect on the green corridor generally and, in particular the habitat network identified in Policy G9 of the Core Strategy;

Although the requirement for enhanced infrastructure is referred to, the total impact is inadequately considered; the effects of an increase in the population of Bramhope of over 30% is hardly considered in terms of social impact, and the requirement and impact of supporting infrastructure such as shops, health facilities etc.,. The proposed Site Allocations for Bramhope would therefore be non-compliant with Spatial Policy 6(i) of the Core Strategy

The proposed Site Allocation is not in accordance with Spatial Policy 1(i) which requires the scale of growth in smaller settlements such as Bramhope to be considered with regard to the Settlement’s size, function and sustainability;

Given the disproportionate allocation to sites in Bramhope, there is little or no discussion of which other sites in the district have been considered and/or the reasons why such sites may have been discounted. This makes it impossible to comment on other options and is therefore unsound.

Following on from above, although the Site Allocations Plans refer to the need for an Environmental Survey to be undertaken before any development on the Breary Lane East Site (**HG-17 (1080-3367A)**) was considered, this indicates an inadequate consideration of the environmental issues prior to the Site Allocation. The site contains an identified habitat network and is surrounded by Strategic Green Infrastructure. Badger setts have been identified in the habitat network, newts are found on the site, bats are present on the site and it is a breeding ground for geese, ducks, coots and moorhens as well as a regular visiting point for herons. The impact of any development on these should have been fully considered before any allocation and indicates that, in this respect, the Site Allocations Plans have not been positively prepared and would be non-compliant with spatial Policy 6(ii) and (vi) of the Core Strategy.

Generally the Site Allocation Plans for Bramhope, and for Breary Lane East site (**HG-17 (1080-3367A)**) in particular, fail to comply with the objectives 8,11, 17, 21 set out in Para 3.3 of the Core Strategy.

The use of Green Belt land contravenes many of the conditions of the NPPF covering the protection of the Green Belt. The fundamental aim of the Green Belt is to keep land permanently open. The essential characteristics of the Green are their openness and permanence amongst other things to check unrestricted sprawl of large built up areas and to safeguard the countryside from encroachment. The site allocation plan fails this test in almost every respect.

3.3 I wish to comment on grounds of Conservation/Heritage:
Highways/Transport : Local services/facilities : Loss of Greenbelt

Conservation/Heritage - Most of the village of Bramhope is contained within a conservation area including or bordering these sites and the community guards this jealously. The addition of additional dwellings in this rural area can only impact adversely on the character of the village.

Highways/Transport – The current problems with over-capacity in highways and transport have been recognised by the council and so far as the latter is concerned, much (from the council's perspective) depends on the council's plans to introduce a New Generation Transport, a trolley bus scheme. We are currently awaiting the result of a Public Inquiry with no guarantee of success for the council and given the parlous economic situation nationally the release of some £75million of government money to part finance the plan is unlikely. Residents in the area do not feel that NGT will solve transport issues, in fact we think it will add to them by reducing the frequency of buses serving Bramhope. The NGT terminus is several miles away from this site and if the bid for NGT is successful more dwellings will mean additional traffic on the already saturated A660. Traffic is already being channelled onto parallel minor roads, never designed for the level of traffic they are now carrying. Plans in the site allocation document for thousands of extra dwellings north, east and west of Bramhope will inevitably lead to additional pressure on the A660 and minor roads causing chaos.

Local services/facilities – Additional dwellings will have an impact on local

primary care facilities, notably GP practices, schools and local shops. Local primary schools are at capacity with no firm plans for new schools. 2014 and 2015 first year of entry to primary schools in the north of the city were far in excess of what the council had expected or planned for and resulted in emergency measures having to be introduced. The council has not demonstrated how these shortcomings will be addressed.

Greenbelt - The council has not demonstrated any exceptional or very special circumstances justifying encroachment on to the greenbelt particularly as brownfield sites are available nearby with no plans to develop them. The council has not demonstrated any change in circumstances that makes this exceptional measure necessary.

Part 4

I do not consider the site allocation plan is legally compliant in respect of the LDS, Statement of Community Involvement, Sustainability Appraisal Report and the T&C Planning Regs as follows:

The plan has not been prepared in accordance with the LDS as detailed above

The council held only very limited consultation, a handful of exercises out in the community. The council website containing the SAP and Core Strategy documents is not accessible by tablet or many other devices, they are too big. PCs, unless powerful, also have difficulty accessing the documents and access is very slow. Residents without access to the internet have no information to research. The council shut down their website on 15 November for maintenance thereby preventing residents from accessing any documentation and the comments form.

The sites are not compatible with the TC Planning Act for the reasons outlined above,.

The sites are clearly not sustainable as detailed above.

They are not in accordance with the Core Strategy as detailed above

Part 5

5.1 No

5.2 No

The following sites are not included in the plan and I would like to express my support for the council's decision not to include them. My reasons for agreeing the exclusion of the sites are essentially the same as my comments for the sites that are included above. That is, they should remain in the Green Belt to avoid urban sprawl, major highway and infrastructure problems and they would increase the number of dwellings in Bramhope even further making the plan completely unsustainable.

118A

118B

1204

3434

3367B

W P Flynn
Councillor Adel & Wharfedale Ward
15 November 2015

SITE ALLOCATION PLAN – COMMENTS

Part 1 Details

Mr
Billy
Flynn

Leeds City Councillor
Leeds City Councillor - Ward councillor
31 East Causeway Vale
Adel
Leeds
Ls16 8LG
Home - [REDACTED]
[REDACTED]

Part 2 Comments

Site Designation Ref: HG2-29 (1199B) Moseley Wood Gardens, Cookridge

I do not agree with the proposed use of this site – see para 3.3 below

Part 3 Soundness of plan

3.1 I do not consider the plan to be sound

3.2 - I do not consider the plan to be sound as it fails to meet a number of the conditions laid out in the Core Strategy and NPPF. The proposed Site Allocations are unsound generally because they fail to comply with Para. 158 of the NPPF which requires 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”. The estimate of population growth in the Core Strategy was apparently based on figures from 2008. The most recent census indicated that population growth was actually some 43% less than expected. The Core Strategy and hence the Site Allocations Plan is therefore based on inadequate and outdated evidence and unsound. The 2011 Census figure showed Leeds had a population in 2011 of 751,500; The Core Strategy document uses inaccurate figures for the population in 2010 further indicating the figures are inadequate and out of date and that the council has failed to monitor the figures as it said it would or failed to take heed of reports which indicated a need for only 50,000-60,000 new houses.

The use of Green Belt land contravenes many of the conditions of the NPPF covering the protection of the Green Belt. The fundamental aim of the Green Belt is to keep land permanently open. The essential characteristics of the Green are their openness and permanence amongst other things to check unrestricted sprawl of large built up areas and to safeguard the countryside from encroachment. The site allocation plan fails this test in almost every respect.

The plans for this site fail to comply with Para 3.3 of the Core Strategy, objectives 8,11,17 and 21 refer.

3.3 I wish to comment on grounds of Conservation/Heritage: Highways/Transport : Local services/facilities : Loss of Greenbelt

Conservation/Heritage – Part of the surrounding area is contained within a conservation area.. The addition of additional dwellings adjacent to a rural area can only impact adversely on the character of the area.

Highways/Transport – The current problems with over-capacity in highways and transport have been recognised by the council and so far as the latter is concerned, much (from the council’s perspective) depends on the council’s plans to introduce a New Generation Transport, a trolley bus scheme. We are currently awaiting the result of a Public Inquiry with no guarantee of success for the council and given the parlous economic situation nationally the release of some £75million of government money to part finance the plan is unlikely. Residents in the area do not feel that NGT will solve transport issues, in fact we think it will add to them by reducing the frequency of buses serving the area. The NGT terminus is several miles away from this site and if the bid for NGT is successful more dwellings will mean additional traffic on the already saturated A660. Traffic is already being

channelled onto parallel minor roads, never designed for the level of traffic they are now carrying. Plans in the site allocation document for thousands of extra dwellings north, east and west of Cookridge/West Park will inevitably lead to additional pressure on the A660 and minor roads causing chaos.

Local services/facilities – Additional dwellings will have an impact on local primary care facilities, notably GP practices, schools and local shops. Local primary schools are at capacity with no firm plans for new schools. 2014 and 2015 first year of entry to primary schools in the north of the city were far in excess of what the council had expected or planned for and resulted in emergency measures having to be introduced. The council has not demonstrated how these shortcomings will be addressed.

Greenbelt - The site will be accessed through Green Belt land. The council has not demonstrated any exceptional or very special circumstances justifying encroachment on to the greenbelt particularly as brownfield sites are available nearby with no plans to develop them. The council has not demonstrated any change in circumstances that makes this exceptional measure necessary.

Part 4

I do not consider the site allocation plan is legally compliant in respect of the LDS, Statement of Community Involvement, Sustainability Appraisal Report and the T&C Planning Regs as follows:

The plan has not been prepared in accordance with the LDS as detailed above

The council held only very limited consultation, a handful of exercises out in the community. The council website containing the SAP and Core Strategy documents is not accessible by tablet or many other devices, they are too big. PCs, unless powerful, also have difficulty accessing the documents and access is very slow. Residents without access to the internet have no information to research. The council shut down their website on 15 November for maintenance thereby preventing residents from accessing any documentation and the comments form.

The sites are not compatible with the TC Planning Act for the reasons outlined above,.

The sites are clearly not sustainable as detailed above.

They are not in accordance with the Core Strategy as detailed above

Part 5

5.1 No

5.2 No

I support the decision to include the following sites in the plan because they are on brownfield land subject to my overall objections to the excessive number of houses in the plan and that the sites are used for elderly/independent housing.

HG2 30 (4216)

HG2 31(4000)

HG2 32 (4217)

HG2 33 (3010b)

HG2 34 (4233)

W P Flynn

Councillor Adel & Wharfedale Ward

15 November 2015

Part 1 Details

Mr
Billy
Flynn
Leeds City Councillor
Leeds City Councillor - Ward councillor
31 East Causeway Vale
Adel
Leeds
Ls16 8LG
Home - [REDACTED]
[REDACTED]

Part 2 Comments

Site Designation Ref: HG2-5 (1095B-1369) Old Pool Bank, Pool-in-Wharfedale

I do not agree with the designation of this site as Protected Land – see para 3.3 below

Part 3 Soundness of plan

3.1 I do not consider the plan to be sound

3.2 I do not consider the plan to be sound as it fails to meet a number of the conditions laid out in the Core Strategy and NPPF. The proposed Site Allocations are unsound generally because they fail to comply with Para. 158 of the NPPF which requires 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”. The estimate of population growth in the Core Strategy was apparently based on figures from 2008. The most recent census indicated that population growth was actually some 43% less than expected. The Core Strategy and hence the Site Allocations Plan is therefore based on inadequate and outdated evidence and unsound. The 2011 Census figure showed Leeds had a population in 2011 of 751,500; The Core Strategy document uses inaccurate figures for the population in 2010 further indicating the figures are inadequate and out of date and that the council has failed to monitor the figures as it said it would or failed to take heed of reports which indicated a need for only 50,000-60,000 new houses.

Pool has a population of around 3000 out of a total population of 85,500 for Leeds Outer North West yet the Site Allocation Plans provide for the allocation of 540 dwellings in addition to the total allocation in the plan for Leeds Outer North West of 2,000. Although not planned until post 2028 the impact on a town identified as a smaller settlement is disproportionate, unjustified and not in accordance with the Core Strategy in a number of respects:

The Site would not be a sustainable development as it would impact dramatically on the local environment because of its scale and is unlikely to be able to be achieved in line with the requirements of Para 4.1.13 of the Core Strategy;

It would have a very negative effect on the green corridor generally and, in particular the habitat network identified in Policy G9 of the Core Strategy (Biodiversity Improvements);

Although the requirement for enhanced infrastructure is referred to, the total impact is inadequately considered; the effects of an increase in the population of Pool of approximately 50% is hardly considered in terms of social impact, and the requirement and impact of supporting infrastructure such as shops, health facilities etc,. The proposed Site Allocations for Pool would therefore be non-compliant with Spatial Policy 6(i) of the Core Strategy

The proposed Site Allocation is not in accordance with Spatial Policy 1(i) which requires the scale of growth in smaller settlements such as Pool to be considered with regard to the settlement's size, function and sustainability;

Given the disproportionate potential allocation to sites in Pool, there is little or no discussion of which other sites in the district have been considered and/or the reasons why such sites may have been discounted. This makes it impossible to comment on other options and is therefore unsound.

Following on from above, the Site Allocations Plans refer to the need for an Environmental Survey to be undertaken before any development on the Pool site was considered. This indicates an inadequate consideration of the environmental issues prior to the Site Allocation. The site contains an identified habitat network of many species. The impact of any development on these should have been fully considered before any allocation and indicates that, in this respect, the Site Allocations Plans have not been positively prepared and would be non-compliant with spatial Policy 6(ii) and (vi) of the Core Strategy.

Generally the Site Allocation Plans for Pool in particular, fail to comply with the objectives 8,11, 17, 21 set out in Para 3.3 of the Core Strategy.

The use of Green Belt land contravenes many of the conditions of the NPPF covering the protection of the Green Belt. This land was taken quite unnecessarily from the Green Belt land and re-designated as Safeguarded Land and contravenes many of the conditions of the NPPF covering the protection of the Green Belt. The fundamental aim of the Green Belt is to keep land permanently open. The essential characteristics of the Green Belt are their openness and permanence amongst other things to check unrestricted sprawl of large built up areas and to safeguard the countryside from encroachment. The site allocation plan fails this test in almost every respect.

3.3 I wish to comment on grounds of Conservation/Heritage:
Highways/Transport : Local services/facilities : Loss of Greenbelt

Conservation/Heritage – Pool is small, historic village with an electorate of less than 1800. The potential addition of a huge number additional dwellings (540) in this area will contribute to urban sprawl and will impact adversely on the character of the village.

Highways/Transport – The current problems with over-capacity in highways and transport have been recognised by the council and so far as the latter is concerned, much (from the council's perspective) depends on the council's plans to introduce a New Generation Transport, a trolley bus scheme. We are currently awaiting the result of a Public Inquiry with no guarantee of success for the council and given the parlous economic situation nationally the release of some £75million of government money to part finance the plan is unlikely. Residents in the area do not feel that NGT will solve transport issues, in fact we think it will add to them by reducing the frequency of buses serving Pool. The NGT terminus is several miles away from this site and if the bid for NGT is successful more dwellings will mean additional traffic on the already saturated trunk road running through the heart of the village and the A660 to the park and ride point. Traffic is already being channelled onto parallel minor roads, never designed for the level of traffic they are now carrying. Plans in the site allocation document for thousands of extra dwellings north, south, east and west of Pool will inevitably lead to additional pressure on the A660 and, particularly, the A658, a very busy east-west artery which runs through the centre of the village and is at capacity and minor roads causing chaos.

Local services/facilities – Additional dwellings will have an impact on local primary care facilities, notably GP practices, schools and local shops. The local primary school is at capacity with no firm plans for new schools. 2014 and 2015 first year of entry to primary schools in the north of the city were far in excess of what the council had expected or planned for and resulted in emergency measures having to be introduced. The council has not demonstrated how these shortcomings will be addressed.

Greenbelt - The council has not demonstrated any exceptional or very special circumstances justifying encroachment on to the greenbelt particularly as brownfield sites are available nearby with no plans to develop them. The council has not demonstrated any change in circumstances that makes this exceptional measure necessary.

Part 4

I do not consider the site allocation plan is legally compliant in respect of the LDS, Statement of Community Involvement, Sustainability Appraisal Report and the T&C Planning Regs as follows:

The plan has not been prepared in accordance with the LDS as detailed above

The council held only very limited consultation, a handful of exercises out in the community. The council website containing the SAP and Core Strategy documents is not accessible by tablet or many other devices, they are too big. PCs, unless powerful, also have difficulty accessing the documents and access is very slow. Residents without access to the internet have no information to research. The council shut down their website on 15

November for maintenance thereby preventing residents from accessing any documentation and the comments form.

The sites are not compatible with the T&C Planning Act for the reasons outlined above.

The site is clearly not sustainable as detailed above.

They are not in accordance with the Core Strategy as detailed above

Part 5

5.1 No

5.2 No

W P Flynn

Councillor Adel & Wharfedale Ward

15 November 2015