

Summary by Karl Lavery

PUBLIC TRANSPORT, HIGHWAYS AND RELATED INFRASTRUCTURE, WHICH DEMONSTRATES WHY 'THE VERY SPECIAL CIRCUMSTANCES' FOR RELEASING THIS LAND FROM GREEN BELT, DO NOT EXIST.

In my representations, I am mindful of the following. With regard to the **Green Belt** the **NPPF** (February 2019) confirmed previous policy regarding its importance and states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances (paragraph 143). The NPPF goes on to say that in the relevant paragraphs: ... "**Very special circumstances**" will not exist unless the potential harm to the **Green Belt** by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations." (Paragraph 144)

It is my intention within my detailed evidence, to provide you with compelling evidence relating to Highways and Transport, that the harm this proposed development will cause, will be very significant and any benefits would be negligible at best. I shall do so by examining, countering and disproving the following findings/representations of CEG and its agents/ representatives.

- They look at this development in isolation, yet ignore the other 3,800 homes targeted to be built in the local area by both Bradford and Leeds Councils, all sharing the same, very limited and overstretched highway and public transport system.
- The Environmental Analysis, refers to Bradford's Replacement Unitary Development Plan in support of its case, yet the scheme cannot satisfy policies TR1 or TR3 of the adopted Core Strategy
- They try to make the case that the A65 is an Urban road and that local speed limits are 30 mph, this with a view to undermining and avoiding the planning restrictions that go with developing next to and creating access roads onto a busy Trunk Road. I shall prove that the A65 is a Trunk Road, how critical and overstretched it already is and that this development cannot meet the DfT and Standards for Highways, requirements for a permissible development.
- They rightly state that there are no listed constraints in relation to highways or transport. I shall demonstrate that although there isn't, essential constraints are put into place, forthwith and the only reason this has not been done has been down to oversight/negligence or intent on the part of Bradford Council.
- On the back of this, they have put forward a plan to build on land that I shall prove is essential to retain to facilitate much needed road improvements, which if their plan is approved, will never be able to happen.

- CEG's appointed consultants undertook a traffic survey, from which they stated what they believe to be the likely impact on traffic volumes of the development. I shall prove, using independent evidence and Bradford Councils own research findings, that their traffic count is at best optimistic and their interpretation of traffic flows is at best spurious and in reality, will be much more adverse than they claim.
- I shall also highlight the very serious impact the other required developments in the area will have, which their report completely ignores.
- They have put forward proposals to mitigate the harm and negative impact of the development on the highways and public Transport. I shall demonstrate their claims for traffic flow and numbers are wildly incorrect, as are their claims of walking distances to the village amenities and railway station.
- They and Bradford Council readily acknowledge that road traffic problems are very significant and that there is little they can or are willing to do about it. Their answer is to instead propose a public transport solution. I shall prove that their public transport solutions are neither viable or deliverable.
- They have made the statements relating to what bus services the residents can use and how they can use them. I shall prove these are both very misleading and their claims are not viable.
- They state that they will 'seek' to divert all bus routes through the development. Whilst 'seek' is in reality without merit, I shall in any event demonstrate how doing so is not feasible and any use of buses by those living on the proposed development, will present a significant hazard on the A65 and is likely to result in a high risk of road traffic accidents and serious injury for those passengers.
- I shall demonstrate that their Framework Travel Plan (FTP) produced by Bryan Hall on behalf of CEG, contradicts, West Yorkshire's Local Transport Plan (LTP) and the consequential Bradford's Local Implementation Plan (BLIP), is even more restrictive and clearly states there will be no material investment in the Wharfe Valley, let alone in the village.
- Both CEG and Bradford propose a significant increase in use of the railway as the transport solution. Even ignoring the other ongoing and impending developments in the area, I shall prove that their claims ignore the existing strain on the trains, (which they acknowledge are already at over capacity) and their proposals cannot be delivered. They cannot even meet the current needs properly, let alone an increased future demand.

- They make claims about how much the residents of the development will walk into the access the facilities within the village. I shall prove that their claims of distances are very optimistic and that such claims are wildly inaccurate.
- Finally, I shall demonstrate how this development is in every way, unable to meet the criteria set out by Section 108 of the National Planning Policy Framework.