

Karl Lavery

32 Wellfield Lane

Burley-in-Wharfedale

LS29 7SX

To

The Planning Inspectorate

c/o Leanne Palmer Room 3/J

Temple Quay House

2 The Square

Temple Quay

BRISTOL

BS1 6PN

13<sup>th</sup> April 2019

Dear Sirs

**Planning Application number: 16/07870/MAO Planning Inspectorate Reference Number: APP/W4705/V/18/3208020 Start date: 25 July 2018 Applicant: CEG Land Promotions Limited (“CEG” or “the Developer”) Address: Land at Sun Lane and Ilkley Road, Burley-in-Wharfedale, Ilkley, West Yorkshire, (“The Site”).**

**This submission is an amended version, to that which I made on August 24<sup>th</sup> 2018, (both in hard copy and online), Whilst I stand fully behind all that is therein, I am mindful of time restrictions and that one of the key areas of the focus of the enquiry is to consider the merits or otherwise of the claimed ‘Very Special Circumstances’ for releasing this substantial piece of land from Green Belt. With this in mind, I have amended it to reflect this focus, when I speak and make my representations at the Inspectors hearing in May.**

***My Focus shall be on Transport, (Buses and Rail) and Highways, (infrastructure and traffic volumes), as other residents will focus on the other matters.***

**STATEMENT 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.**

I, Karl Lavery, am a resident of Burley in Wharfedale, and have lived there since 2000. I am a Company Director of a business employing 26 people, in the neighbouring North West Leeds area. I am also a former Police Officer.

## **Transport, Highways and Traffic.**

Having analysed the reports produced for CEG by Bryan Hall, these primarily being the Environmental Assessment, (**EA**) and the Framework Travel Plan, (**FTP**) and submitted by CEG in support of their application, I have concluded that whilst some conclusions and ‘suppositions’ appear reasonable, a number of critical assumptions and assertions are at best erroneous or optimistic and in some cases blatantly not true. Whilst all his analysis ignores the parallel impact on the local roads and public transport, of the additional 1800 new homes to be separately provided by Menston, Ilkley and Addingham, which they are obliged to facilitate. This, in addition to those sites already committed to in the next 3 years.

Equally, it completely ignores the fact that Otley, (the boundary of which is only 1.45KM from Burley in Wharfedale), which is part of Leeds Local Authority, has been targeted with providing 2,000 further homes. Yet both communities share much of the highways and public transport infrastructure.

## **Traffic Volumes CEG and Bradford Council’s Assumptions v Reality.**

In the first instance I wish to address the Traffic Volumes on the A65 in the immediate Vicinity of the proposed development, on Countances Way and Ilkley Road, and the assumptions of additional vehicle movements that would be generated by the proposed development and the role and requirements of the A65 both now and in the future.

As background, in their **Environmental Assessment** document, (**The EA**), in para E2.29, it refers to Bradford’s Replacement Unitary Development Plan, which clearly states the following;

*Policy TM2: Planning permission will not be granted until the Council is satisfied that the proposal does not adversely affect existing and proposed transport infrastructure or services in the vicinity of the site. Improvements considered necessary to overcome any adverse impacts of the proposal will be secured by agreement or undertaken as part of the development;*

Although this policy has now been deleted and replaced by the transport policies in the Core Strategy, the general aim and thrust of the policy remains the same as in the newer Core Strategy Policies TR1 and TR3. I shall provide herewith, irrefutable evidence the proposed transport infrastructure is in some cases not deliverable and in other cases, Bradford Council has been negligent in not applying prudent forward planning and provisioning for future critical safety and capacity improvements to and widening of, the highway, (A65) at this location. The evidence to follow, clearly demonstrates, this development proposal alone, (not to mention the significant other developments Bradford and Leeds council intend to impose on this and neighbouring communities, which share the same services and infrastructure), will significantly adversely affect the existing transport and highways infrastructure, both in terms of overstressing current and future capacity and creating even worse congestion, bringing with it, a notable increase in air pollution. These cannot be reasonably or cost effectively mitigated and the residual cumulative impact on the road and rail network would be severe. Hence it should not proceed.

## The Role of the A65 and Traffic Volumes.

- Statutory Instrument 1194 of 1992, relating to the construction of the then new Burley in Wharfedale bypass, clearly refers to the A65 and A660 as a **Trunk Road**. (Screen shot appended herewith in **Appendix 1**).
- E4.5 of the EA refers to;  
The A65 in the vicinity of the Site is a strategically important primary route
- The DfT definition of Urban Roads, are those within a settlement of 10,000 people or more.
- However, with a village population of some 7,500, the A 65 passing in this area, next to the village, is thus a Rural A Road.
- The DfT's own traffic Survey, in Section 1 page 8, Road use Statistics, Great Britain 2016, (**Appendix 2**), concludes, that Rural A roads constitute 9% of the country's road network yet handle 29% of the traffic.
- This road is not only critical for the local communities but is the only realistic commercial access for long distance, commuting, delivery and holiday traffic between Leeds, local communities, the Yorkshire Dales communities and the Lake District. Even during weekends and the holiday season, it often operates at a crawling pace with **current** levels of Vehicle miles.
- Despite clear evidence to the contrary, In para's E2.21 and E2.22 of the EA, CEG are trying to down play the importance and deny the true designation of the A65 and A660 as a Trunk Road and inferring it is a Non Trunk Road. In so doing they are trying to undermine the clear and strict Design Manual of Roads and Bridges (DMRB) design standards for Trunk Roads. They are also stating that the A65 road in this area is in an Urban area. It is not. It is rural to semi-rural! In E2.23, they try to strengthen their argument as they refer to;  
*"...The application of MfS advice to all 30mph speed limits as a starting point is in keeping with MfS1."*

This is irrelevant, as the speed limits in the areas surrounding site and the village, vary between 40mph and 70mph. Thus Standards for Highways directive in their Design for DMRB for Trunk Roads must apply! (**Appendix 3**).

This is vitally important! Section 1.7 of DMRB VOLUME 6 SECTION 2 PART 7 – TD 41/95 – VEHICULAR ACCESS TO ALL PURPOSE TRUNK ROADS, clearly states in bold;

- 1.7 The primary purpose of the trunk road network is **to provide for the safe and expeditious movement of long distance through traffic. That means strictly limiting the number of direct accesses to trunk roads.** It means ensuring that the full implications for traffic and road safety are taken into account when proposals are made for new development in the vicinity of trunk roads. This is whether it involves new access or increased use of existing accesses, particularly onto dual carriageways where speeds are high. **Limiting direct access remains a prime objective of the Overseeing Organisations.**

The safety and traffic flow considerations for Trunk Roads are rightly more onerous and I would suggest, are deliberately being down played by CEG. In addition, The Dual Carriageway was due to be extended between the village and Ben Rhydding in the late 1990's, soon after the Burley Bypass was finished, to the extent that Compulsory Purchase notifications were issued to several properties on the proposed route. However, money was short and it was shelved. Yet the need for it was compelling then and is now overwhelming! Yet Bradford Council has not even had the foresight to ringfence the land that would be necessary for this to take place. Which, if this plan were to go ahead, it would no longer be possible to undertake the much needed road upgrading.

- Para 7.13 Of Bradford's own Local Development Framework (LDF) Travel Study, (**Appendix 4**), conducted in October 2010, concluded there would be ongoing increasing demand on the A655/ A660 corridors and local railway, which was before the significant and arbitrary increase it imposed on the number of new homes it expects the area to provide.
- It is worthy of note, para 7.19 of the same study, has largely ignored the significant impact on the A65/ A660 corridor on additional traffic bound to and from **Leeds** and its outlying but neighbouring communities, such as Otley, Yeadon, Rawdon and Guiseley in their assessment, despite this having a significant impact.
- Para 7.94 of the same 2010 study concluded 'demand flows in the Preferred Option are significantly higher than in the base year along the length of the A65 and A6038 from Addingham to Shipley. The situation is complicated by re-assignment of traffic onto parallel local routes to avoid delays on the A65/A6038. The additional demand is highest between Burley and Shipley, with around 1000 – 1400 extra vehicles in both directions split between the A65/A6038 and parallel routes.' Again, this was before the significant increase in 2,600 new home requirements Bradford Council has placed upon the communities in the valley, (as well as the 2,000 Leeds is imposing on neighbouring Otley) and the substantial development that has taken place between 2010 and the point these requirements came into force.
- Para 7.95 states. 'Significant increases in delay are apparent at junctions in Ilkley, Menston and Guiseley. Even though Guiseley is in Leeds district, delays at the junction of the A65 and A6038 will have serious effects on connectivity both within Bradford district, and between Bradford and Leeds.'
- Para 7.97 states. 'There are currently no significant transport schemes currently planned for the A65/A6038 corridor.'

***Critically. in the EA, E 2.39 also states, 'there are no listed constraints in relation to highways or transport.'***

***This is currently true but should not be the case. Despite the growing traffic volumes and the significant increase in the number of new houses Bradford Council requires of the communities in lower Wharfedale, together with the fact that some 20 years ago, it was intended to imminently use this land to upgrade this stretch of road to dual carriageway, which was a need first put forward in 1936 and a full assessment of the land was undertaken to this end, in 1991. (See Appendix 5, Agricultural Land Classification for***

**A65 Manor Park to Denton Bridge Bypass), the Council has not had the foresight or competence to ring fence the relevant tranches of land that will, in the near future, be needed to improve the highway, thereby protecting such land from development that would otherwise forever preclude those improvements taking place.** Specifically, the North and North West elements of the proposed development will build on the very land that will be needed in due course, to provide the necessary improvements and upgrades to the A65, for the purposes of safety, capacity and mitigation of flooding. The bends on Countances Way are prone to accidents, (many non-reportable), resulting traffic chaos. Immediately to the West of the site, the road floods badly on occasions. Most recently, in September 2012, January 2014, December 2015 and March 2019, when this ‘main trunk road’ was closed at this point for up to 36 hours and the narrow Moor Road has also been closed due to a land slide.

I would suggest that this large development, will significantly impede the land’s ability to soak away rainwater and water run off from the nearby moor, which is going to place far greater pressure on the lower lying, neighbouring land to facilitate the drainage. This land is already regularly subject to ground water flooding and in turn will lead to more frequent and more serious flooding and consequent closure of the A65 Trunk Road next to it. This conclusion is supported by the Government’s own study, (**Pages 7, 8 and 9 of Appendix 5**), which clearly and repeatedly refers to the poor drainage, poor soil and poor workability of much of the land on this site, which would logically lead one to conclude, that were the significant construction proposed on the land, to go ahead, it would seriously impede what drainage there is, thereby exacerbating the already considerable risk of flooding of the A65 in the area.

There is also a constant battle to prevent the river Wharfe undermining the A65, as it runs to within a few feet at this point. This section of road urgently needs to be widened, straightened, raised, set back from the river and ideally converted into a continuation of the dual carriageway, (which currently ends some 850 metres from this critical point), through to and including Denton Bridge at Ben Rhydding near Ilkley, (as the original plans recognised). This will not be possible if the CEG planning application is approved as it stands. Any land on the Northern Fringes and land to the West of the main buildings of Black Bull Farm, must not have housing built on it, to ensure that when funds permit, the critically necessary Trunk Road improvements can be made.

### **Current and Future Traffic Volumes**

#### **CEG commissioned a traffic count in November 2015 on Countances Way.**

Firstly, para E3.6 of the EA, erroneously assumes the relevant benchmark is ‘Transport in the urban Environment’ for Inter Urban Roads. I would challenge the validity in this assumption, given this is a main trunk road passing through distinctly separate conurbations through Rural and semi-rural areas.

In E4.37 of the EA, there is a table of traffic on the A65 **projected to 2021**. This takes into account, ‘Committed’ development **but ignores the impact of most of the other 2,500 homes that the area is required by Bradford Council, to be build but as yet remains ‘uncommitted’ nor the 2,000 homes Leeds requires neighbouring Otley area to provide.** (**Appendix 9**). If we look at their traffic count for Countances Way.

Their ‘**projected**’ findings were for the AM peak hour 1649 vehicles and for the PM peak hour, 2119 vehicles.

We commissioned our own week-long traffic count on Countances Way, (**Appendix 6**) undertaken by specialists, Advance Traffic Research, which ran from October 12<sup>th</sup> 2016. Our findings were that the weekday traffic flows between 7 to 8 am and 8 to 9 am were very similar, so we averaged them. Our conclusion for ‘**current**’ traffic flow was that am peak hour is 1,662 vehicles and pm peak traffic is 1,787 vehicles. Generally speaking, there was ‘at the time’, circa 22,000 vehicle movements per working day, of which HGV’s constituted circa 7% of the total.

As you can see, the figures are very similar, yet are set 5 years apart, (**as ours are current, whereas, CEG’s are projected**)! This strongly indicates their assumptions are very optimistic. Their figures are extrapolated by formulae, to come up with an accepted assumption. Ours are based upon actual numbers!

In E 5.15, they then look to predict the number of vehicle movements that will be generated by the site once fully constructed. They are predicting in the am peak hour, 319 vehicle movements in the am and 308 in the pm peak hours. It is also worthy of note that their assumptions of traffic generated by the school are very optimistic, as, due to time constraints and distance from the school, many parents drive their children to the existing primary schools and drop them off on their way to work and they are more central to the village.

Next to the proposed site, (and thus slightly nearer the village amenities), is the Wellfield Lane development of 40 homes of assorted styles and sizes, built some 19 years ago. They are of similar size, mix and type proposed for the CEG site. With this in mind, on Friday October 14<sup>th</sup> 2016, between the hours of 0700 and 2000, a number of volunteers from the village, undertook a strictly controlled traffic count of all traffic movements into and out of the development. Although this only covered the main 13 hour period of the day, there were 310 vehicle movements. If we reasonably assume that the other 11 hours generated a total of just 40 vehicle movements, we have a total of 350 for a 24 hour period.

Our findings are very much in keeping with Bradford’s own LDF Traffic Study of October 2010, (**Appendix 4**), which at para 7.97, concluded that in the Wharfe Valley, each new home would generate 8.5 vehicle movements per day. So to use Bradford’s own assessment, (as opposed to CEG’s biased assessment), the 2,500 new homes that Bradford has arbitrarily imposed upon the valley between Menston and Addingham, (almost all of which will have to be built on Green Belt land), will generate an additional 21,250 vehicle movements per day and the only main road is the already over stretched A65! **Thus, it would double the traffic on the A65!**

During the peak hours, our findings extrapolated x 12.5 to equate them to the ‘minimum’ of 500 homes proposed for the site, were slightly higher in the morning, but broadly in line with CEG’s claims. However, the pm peak was 1/3<sup>rd</sup> higher than CEG’s assumptions, at over 410. That is without the notable increase in impact, of the proposed school or the extra houses any developer will try to squeeze on the site, if the school does not go ahead.

With the above in mind, para E5.18 infers they will ‘**seek**’ to promote improvements in public transport services, which I shall address later.

E5.19 and E5.20 refer to the guidance to include highway links for developments which will increase traffic by more than 30%. They state that on Ilkley Road opposite the Generous Pioneer, the traffic in peak times will increase by between 40% and 49%, which I itself tells

you how inappropriate such large development is. However, it appears to assume that **all of that** traffic will either go through the village or turn East at the roundabout toward Otley and almost none of the traffic from that part of the development will turn West toward Ilkley on the A65. I say this as they assume only a 3% to 4% increase in traffic along Countances Way, much of which would come from the two A65 entrances to the development. Such an assumption can only be viewed at best, as disingenuous, given the schools, shops, services, etc that are in Ilkley, as can be seen from the survey undertaken by Advanced Traffic Research at **(Appendix 6)**

Our week long, A65 Traffic Count showed a working day daily average traffic flow on Countances Way of circa 22,000 vehicle movements, fairly evenly split between East and West bound. If you were to then extrapolate our findings on Wellfield Lane, that a total traffic count of  $350 \times 12.5 = 4,375$  vehicle movements generated by the proposed site per working day. Almost all of that traffic is going to end up on the A65, be that East or West bound. That alone, constitutes an increase in trunk road traffic of circa 20%. This completely ignores the additional impact of the other 2,000 homes that are required to be built between Addingham and Menston and the 2,000 homes required to be built in the Otley area, which cumulatively, will double traffic levels, let alone significantly above 30% that will necessitate very significant highway improvements in the near term.

## **Public Transport**

**In this section I shall refer to evidence form the EA, the Framework Travel Plan (FTP) produced by Bryan Hall on behalf of CEG, West Yorkshire's Local Transport Plan (LTP) [Appendix 7] and Bradford's Local Implementation Plan (BLIP), [Appendix 8]. In addition, I shall add my own findings from research we have undertaken.**

E6.7 of the EA document, targets a 10% reduction in car use. However laudable this may be, it ignores the significant practical issues noted below, that mean it is not deliverable.

- In the 15 year LTP, it is readily acknowledged that bus travel has decreased notably and due to further budget cuts bus services 'will' suffer further cuts. *Thus forcing people onto an already inadequate/ deteriorating bus service will not work.*
- Bradford's own 2010 LDF Travel Study, **(Appendix 4)**, concluded of the area, the following; in 7.100; *Similarly, it will be difficult to reduce bus journey time or journey time variability, because of the limited opportunities for providing bus priority.*
- On pages 21, 22 and 24 of the LTP, Bradford has clearly stated where its priorities are and where it will be targeting funding for improvements. Anything North of the Aire Valley, (5 + miles away), is NOT a priority to Bradford. ***The Wharfe Valley will receive no additional funding or improvements.***
- The LTP speaks of extra rail carriages on the 'network'. *But these will not be going on the Wharfedale Line. ( I shall address this specifically later).*
- On page 30 of the LTP, it clearly states, **Overcrowding is discouraging more rail use. Trains approaching Leeds have the worst overcrowding outside London, and there is a lack of capacity at Leeds Rail Station (E9).**
- Yet by contrast, Bradford's LDF Travel study states at 7.101, We therefore recommend a focus on making best use of the existing rail services on the Wharfedale line, and

specifically, encouraging modal shift to rail from car by improving the provision of Park and Ride at all outlying rail stations. (As can be seen from above, Bradford Council has no intention to fund this, whilst proposing plans that will exacerbate already serious and dangerous overcrowding and capacity problems).

- *It is also worthy of note that the vast majority of rail commuters travel to Leeds NOT Bradford. There is always spare capacity on the Bradford train, as locals do not want to work there. Between 7 and 8.45 am on weekday mornings, typically 7 to 10 people get on each of the Bradford trains, whereas between 40 and 70 get on to each of the Leeds trains during that time. The lower Wharfe Valley is essentially a commuter belt for Leeds and Harrogate.*
- On Page 32 of the LTP it states,  
Transport and land-use planning are not sufficiently 'joined-up', which contributes to increasing the need to travel, the distance travelled and the type of transport chosen. There was a 39% increase in the distance travelled to work in West Yorkshire between 1991 and 2001 (C7).
- *This clearly demonstrates a lack of clarity and focus on the part of Bradford Council, in that homes are not being built near to where the jobs and established public transport are, thus people are having to travel further to work. It does not make sense to build all these relatively expensive homes in Burley in Wharfedale and make people travel to Leeds, Bradford and Harrogate to work. It simply creates more congestion and far greater emissions than would be the case if these homes were more affordably built where they were needed, and where there is ample Brownfield land available, as opposed to where a developer would like to build them for the pure motive of profit and at huge detriment to the community. Surely Bradford should be focusing its efforts on making those sites attractive to developers.*
- On page 35 of the LTP, it states,  
Car ownership is relatively low in West Yorkshire (30% of households have no car) compared to the national average (26% of households have no car), which restricts access to some jobs, services and education (Q8).  
*Yet that is for the W.Yorks as a whole and clearly including the many living in city centres and some less affluent urban areas. It demonstrates the need to build truly affordable housing in areas, which are accessible by those who need them and nearer the jobs and the public transport to get them to their jobs. It does not really apply to the Lower Wharfe Valley, which is rural/ semi-rural and where car usage is essential.*

On page 72 of the LTP proposal 24, refers to increasing capacity on the rail network by getting extra rolling stock and trains with more carriages. *This may be the case within W.Yorks as a whole but is not deliverable on the Wharfedale Line for the following reasons. Some of the stations on the line cannot have their platforms extended. More importantly, we have a letter from Robert Malcolm, the information Officer at Network Rail, under FOI2016/00740, dated July 29<sup>th</sup>, which states the following;*

I can confirm that we hold the information you requested. In direct response to your request

there are no traction power limitations preventing the operation of a single 5 or 6 car electric multiple unit (EMU). However, as the effect of train timetables on the overhead line voltage and traction power supply capacity is assessed as a whole, through each feeding area the aggregate effect of a full timetable may limit the size of the trains (e.g. 4 cars instead of 5 or 6). The system used in the electrification of this line was the only option available, and is still widely used across the current network. We are in the process of reviewing traction power capability across the route for industry planning purposes and identifying upgrade options. **This work is currently focused on the East Coast Main Line (ECML) where Intercity Express Programme (IEP) & open access operator rolling stock changes are expected soonest, and the Trans Pennine route for which electrification design is ongoing**

*Despite the undertakings made by the rail companies and W.Yorks Metro, there are problems with power capacity on the grid and whilst 'technically,' there is nothing to stop the larger 6 carriage trains, practically, any foreseeable improvements in power supply are to be committed at improvements to the East Coast Line and the Trans Pennine Link. Thus, it is reasonable to assume that for the foreseeable future, the Wharfedale Line will not be able to have more trains or trains with six carriages.*

**In the FTP,** There are a number of statements and assertions that are incorrect.

3.1 Refers to the 5KM Burley in Wharfedale is from the settlement of Ilkley. This is not true. As Ilkley and Ben Rhydding have long since fully merged physically, thus **the edge of the settlement is only 1.65 KM away.** (And that is before any further development and subsequent encroachment in Burley or Ilkley/Ben Rhydding, which if these plans are approved, would reduce it to **c1.17 KM.**

3.5 States, '**people will walk up to 800 meters to the railway station,** yet we know the centre of the proposed development is **c1,500 o 1,600 meters** from the station by the most likely walking routes..

3.6 to 3.8 and the related appendix refers to bus services. He states that residents from the development can catch the 962 bus to the top of Prospect Road, leaving them only a 40 metre walk to the railway station. *However, he conveniently forgets to state that the first bus gets there at 10am and the last bus passes there at 5pm. That makes the statement worthless and the service meaningless to the most normal people who do a full working day in Leeds or Bradford, who will need to use the station much earlier than that in the morning and later than that in the evening. Equally, it is only a small hopper bus with very limited capacity.*

*It also refers to CEG 'seeking' to divert **all** the bus services through the development. This ignores the fact it will NOT have any through road and the fact that the X84 between Leeds and Ilkley/Skipton, is a limited stop express service, which will not make such a diversion, not to mention it is a large double decker bus, which would struggle to negotiate crowded and twisting estate roads and would present a danger to pedestrians.*

*The X52 to Harrogate is also a limited stop service and a large bus, which is not likely to divert through the estates and does not do evening or weekend services. As the first bus would arrive in Ilkley at 0920 hrs, it is of no use to those whose working day starts before then. Equally,*

those relying on the bus to travel to work in Harrogate, would have to finish early every day, as the last bus that goes through to Burley, leaves Harrogate at 1630 hrs.

**Serious Accident Risk.**

**Were any of the buses, X84, X52 or the 962 to stop outside of the development, on their way to the railway station, Leeds, Otley or Harrogate, then that would represent a significant accident risk, as passengers will have to cross this very busy trunk road at hazardous points, (being between a blind crest on the tree shrouded bends in the road, the two proposed busy new junctions to the proposed development and the main roundabout.**

**At the very least, an independent investigation should be undertaken by the Accident Investigation Branch of the Police, ROSPA or similarly qualified and neutral organization, of the risk posed by significant numbers of residents crossing this section of the A65 at various times of day, based upon the expected number of residents, traffic and proposed new road layout..**

*As can be seen, the case they put forward for bus services is completely without merit!*

3.10 . *The research paper referred to, was NOT done locally, so its relevance is very questionable and the fact is, very few of those living on the current Western fringe of the village walk to the Station. They either drive and park, get a lift, or drive to work. In inclement weather conditions, this situation is even more so. This also ignores the previous evidence of the lack of train capacity. This will be more so, for the proposed development, which is still further from the station.*

3.14, 3.15 & 3.16 . *As noted earlier. Network Rail appear unable to support the commitment of the train operators and WYPTE to provide any meaningful increased capacity on the Wharfedale Line. This situation is made worse, as Bradford council has clearly stated in the W. Yorks LTP and in the BLIP, that Wharfedale is not a funding priority, so it will not be getting improved bus services.*

3.19 *states the main facilities of the village are 900 meters from the site. **In fact the main Co-op store and the doctors surgery are 1,500 meters from the site.** Whilst they may be walking distance for some, I am not sure the elderly, less able, parents with toddlers and pushing prams, whilst holding up an umbrella to stay dry and carrying their shopping would agree with Mr Hall's assessment. Which probably explains why we already have a significant parking problem, particularly in the vicinity of the Co-op and doctor's surgery.*

**I shall relate all the evidence above, to Section 108 of the National Planning Policy Framework, which clearly states:**

In assessing sites that may be allocated for development in plans, or specific applications for development, it **should be ensured** that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
- b) **safe and suitable access** to the site can be achieved **for all users**; and

c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

As you can see from the evidence above, 108 a) is not feasible for this site, in any meaningful way. 108 b) This cannot be achieved on this site. 108 c) This site would severely harm the local green belt and would critically overload an already very stretched highways and public transport network, with no means of mitigating it in any reasonable manner.

**In Summary, with all of the above in mind, I note that Paragraphs 2.1 , 2.2, 2.3 and 2.5 of the EA and Paragraphs 2.1, 2.2, 2.3 and 2.5 of the FTP, all make specific references to the requirements stipulated by the National Planning Policy Framework (NPPF), using them to justify their proposed developments. Yet under close scrutiny, on each of these counts, it is clear from the evidence above, their claims are at best not objective and at worst plain dishonest. This proposed development does not and cannot meet the NPPF requirements and would cause severe, irreparable harm to the local highways, community and environment and thus should not be approved.**

Yours Sincerely

**Karl Lavery**

[Karllavery1010@googlemail.com](mailto:Karllavery1010@googlemail.com)

## Appendices

- 1) Statutory Instrument 1194 of 1992, relating to the construction of the then new Burley in Wharfedale bypass.
- 2) The DfT's traffic Survey, Road use Statistics, Great Britain 2016,
- 3) Standards for Highways directive in their Design for DMRB for Trunk Roads
- 4) Bradford's own Local Development Framework (LDF) Travel Study
- 5) Agricultural Land Classification for A65 Manor Park to Denton Bridge Bypass
- 6) Advance Traffic Research, traffic count
- 7) West Yorkshire's Local Transport Plan (LTP)
- 8) Bradford's Local Implementation Plan (BLIP)
- 9) Leeds City Council North West Housing Allocation
- 10) My previous submission of August 24<sup>th</sup>, 2018