

Report of Chief Planning Officer

Report to Development Plan Panel

Date: 16th December 2014

Subject: ODD (Otley Development Disgrace) Open Letter & Petition Response

Are specific electoral Wards affected? If relevant, name(s) of Ward(s): District-wide	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Are there implications for equality and diversity and cohesion and integration?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Is the decision eligible for Call-In?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Does the report contain confidential or exempt information? If relevant, Access to Information Procedure Rule number: Appendix number:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Summary of main issues

- Following the publication of the Site Allocations Plan, Issues and Options consultation document summer 2013 (June – July), the City Council has received on going correspondence from the Otley campaign group ODD (Otley Development Disgrace), expressing a number of planning concerns linked to the scale and potential impact of housing growth in the settlement. These concerns reflect issues which have been raised elsewhere across the District, relating to the delivery of housing growth and the provision of infrastructure. These matters were debated extensively at the Core Strategy examination, where the Inspector in finding the Plan sound, acknowledged such issues in his report but concluded, “I have neither seen nor heard anything to persuade me that the HMCAs would not be able to accommodate the levels of development envisaged in the Core Strategy. Site specific matters will be addressed at the Site Allocations Plan stage.” (para. 33 of the Inspectors Report, 5th September 2014).
- In listening to the above ODD concerns and in exploring how they might be addressed through the Site Allocations Plan process, both officers and members (Cllr Gruen and Cllr Walshaw) have subsequently met with ODD representatives, as a basis to respond to matters which have been raised. In responding to a series of questions raised through an open letter to Cllr Gruen (received in August) and a

petition, a comprehensive response has been prepared and is attached at Appendix 2.

Recommendations

3. Development Plan Panel is requested to not the contents of this report, and the response to the ODD petition and letter.

1. Purpose of this report

- 1.1 The purpose of this report is to set out for DPP members a proposed response to a petition and letter received from the ODD campaign group. The proposed response to this correspondence is attached at Appendix 2.

2 Background information

- 2.1 The Core Strategy sets the overall housing requirement for Leeds (70, 000 net between 2012 – 2028) and its broad distribution through 11 Housing Market Characteristic Areas (Spatial Policy 7). The Outer North West HMCA has a target of 2,000 dwellings, 3% of the overall total. Following the final Core Strategy hearing in May 2014 and the receipt of the Inspector's Report in September 2014, the City Council adopted the Plan on 12th November 2014. In finding the Plan sound, the Inspector has acknowledged concerns raised by community groups regarding the scale and distribution of housing growth but was not persuaded that the Housing Market Characteristic Areas (HMCAs) cannot deliver the levels of growth envisaged.
- 2.2 Within the context of the Core Strategy, the Site Allocations Plan Issues and Options document, was subject to an 8 week period of consultation summer 2013 (3rd June – 29th July). Over 7,000 representations were received and following the close of the consultation, the City Council has received on going correspondence from Otley residents and the ODD group regarding concerns associated with the scale of housing growth.

3 Main Issues

- 3.1 The Core Strategy sets the housing targets for the Leeds district as a whole and the distribution of new housing across the 11 Housing Market Characteristic Areas. Otley falls within the Outer North West Area which also includes the settlements of Pool and Bramhope. The housing target for Outer North West is 2,000 new homes by 2028 (3% of the district requirement). This compares with 3% in Aireborough 15.5% in the City Centre and 17% in East Leeds. As emphasised above, the Core Strategy is now adopted and it is now the focus of the Site Allocations Plan to address site specific matters. Following submission, this Plan will also be subject to independent examination prior to an Inspector's Report being received.
- 3.2 Following the final Core Strategy hearing and the close of Issues and Options consultation on the Site Allocations Plan (SAP), the City Council has received

correspondence from the ODD group in August, together with letters from individual residents regarding the implications of the Core Strategy and Site Allocations Plan for Otley. These issues are reflected in the open letter to Cllr Gruen and can be summarised as follows: the SAP timetable and consultation, the scale of development proposed in Otley, commuting patterns, parking and congestion, household size, sustainability and infrastructure provision (Health & Education). As noted above, the correspondence was received in August but in view of the timing of Core Strategy adoption and the clarifications this has made, the Executive Board member has waited until then before providing a draft response. However, because of the wide range of issues raised that would apply more generally, Cllr Gruen has decided that this draft response should be considered at the first available Development Plan Panel meeting.

- 3.3 Appendix 2 of this report, responds to specific questions on each of these points in turn. As emphasised above, these matters reflect concerns which have been raised elsewhere across the District and were debated extensively as part of the Core Strategy examination process. These concerns have been acknowledged by the Inspector and by the City Council. In moving forward and through implementation, it is important therefore that where appropriate, these are addressed through the monitoring of the Core Strategy and in the preparation of the Site Allocations Plan.

4. Corporate Considerations

4.1 Consultation and Engagement

- 4.1.1 The Core Strategy has now been adopted and has been found by an independent Inspector to be sound. The Site Allocation Plan has been subject to Issues and Options consultation in summer 2013 and there will be a further opportunity for representations to be made at Publication stage, prior to submission. Outside of these processes, officers have been responding to community groups and individuals across the District on planning matters and in relation to the preparation of Neighbourhood Plans, for which there is a high level of interest.

4.2 Equality and Diversity / Cohesion and Integration

- 4.2.1 In the preparation of the Core Strategy and Site Allocations Plan, due regard has been given to Equality, Diversity, Cohesion and Integration issues. This has included meeting the requirements of the Strategic Environmental Assessment Directive, which has meant that these Plans are subject to the preparation of a Sustainability Appraisal. The purpose of such Appraisals is to assess (and where appropriate strengthen) the document's policies, in relation to a series of social (and health), environmental and economic objectives. As part of this process, issues of Equality, Diversity, Cohesion and Integration, are embedded as part of the Appraisal's objectives.

4.3 Council policies and City Priorities

4.3.1 The Core Strategy and the emerging Site Allocations Plan, play a key strategic role in taking forward the spatial and land use elements of the Vision for Leeds and the aspiration to the 'the best city in the UK'. Related to this overarching approach and in addressing a range of social, environmental and economic objectives, where these Plans also seeks to support and advance the implementation of a range of other key City Council and wider partnership documents. These include the Best Council Plan (2013-17) and Leeds Joint Health and Wellbeing Strategy (2013-2015).

4.4 Resources and value for money

4.4.1 The preparation of statutory Development Plan Documents is an essential but a very resource intensive process. This is due to the time and cost of document preparation (relating to public consultation and engagement), the preparation and monitoring of an extensive evidence base, legal advice and Independent Examination. These challenges are compounded currently by the financial constraints upon the public sector and resourcing levels, concurrent with new technical and planning policy pressures arising from more recent legislation (including the Community Infrastructure Levy and Localism Act). There are considerable demands for officers, members and the community in taking the Development Plan process forward.

4.5 Legal Implications, Access to Information and Call In

4.5.1 None.

4.6 Risk Management

4.6.1 Following the adoption of the Core Strategy there is considerable urgency to take the Site Allocations Plan forward. This is needed to help implement the Core Strategy, provide clarity for investment decisions (and the co-ordination of infrastructure), to take forward the Council's strategic priorities and to provide an up to date planning framework for emerging Neighbourhood Plans.

5 Conclusion

5.1 Within the context of the Core Strategy process and the preparation of the Site Allocations Plan, the City Council has received correspondence from the ODD group. In response to an open letter to Cllr Gruen (and a petition to the City Council), a detailed response has been prepared for each of the questions raised. This is attached as Appendix 2 to this report.

6 Recommendations

6.1 Development Plan Panel is requested to not the contents of this report, and the response to the ODD petition and letter.

7 Background documents¹

7.1 None

7 Appendices

8.1 Open letter to Cllr Gruen, detailed response to ODD questions.

¹ The background documents listed in this section are available to download from the Council's website, unless they contain confidential or exempt information. The list of background documents does not include published works.

Appendix 1 – Correspondence from ODD

Open letter to Councillor Peter Gruen

Dear Councillor Gruen

Please accept the appended petition signatures as an indication of the widespread concern about the implications for Otley of the draft Site Allocations Plan (SAP) and the level of support within Otley for the ODD Campaign.

We would like to acknowledge the following:

- The Local Development Framework represents a huge undertaking for Leeds City Council and (while we may be very critical of aspects of what has been proposed) we are satisfied that Councillors and Officers are making their best endeavours to bring the task to a successful and acceptable conclusion for the City. It is also fully accepted that they are obliged to work within a framework defined by central government.
- Necessarily we have commented upon what has been published thus far, particularly the draft SAP. It is understood that there will now be some level of consideration of the overall impact of the proposed development sites on communities prior to publication of the next version of the SAP.
- The support given to the ODD Campaign by Otley residents and Otley Town Council

Questions

1. The published timetable for the onward development lacks detail (and there have been indications of slippage). What in detail is the onward development process and timetable?
2. How will the combined impact of the proposed SAP sites be assessed during the current development of the second draft of the SAP?
3. Following publication of the second draft of the SAP, to what extent will it still be possible for the public to bring about meaningful changes in the final SAP document?

We would like to make it clear that the ODD Campaign is not against the development of Otley. Development is inevitable and, while there is clearly a range of views on what form it should take, there is widespread support within Otley for the stated aims and objectives of the ODD Campaign (see page 3).

The draft SAP does not quantify its development implications for individual communities. We calculate that it implies an additional 1,177 houses in Otley (see page 10) — an increase of 20% (based on 2001 census data).

4. Do LCC accept that (a) the draft SAP currently implies an additional 1,177 houses in Otley, (b) that the actual housing outcome on the SAP sites could be lower or higher than planned, and (c) that (inevitably) there will also be additional new housing in Otley on "windfall" sites?

5. Given that many of the Otley SAP sites are already allocated and have developer involvements, approximately how many new houses does LCC expect to be completed in Otley (a) by 2018, (b) by 2023 and (c) by 2028? Planned increases of this size should not be contemplated without a realistic appraisal of the consequences for the community and appropriate mitigation.

The consequences for Otley include: **TRANSPORT**

7. How many of the current Otley population commute to work out of Otley?
8. How many of these commute into Leeds?
9. How are the Leeds journeys split between modes of transport?
10. How many use the A660?

- It is widely recognised that the A660 corridor into Leeds is already loaded beyond capacity and the routes into Bradford are no better. The inadequacy of the A660 was highlighted back in 2005 by the UDP inspector - this in the context of just the East of Otley development. More recently the A660 was "recognised as one of the most congested radials in Leeds" (2013, LOG transport document).
- Given that the majority of people occupying the currently planned new houses will inevitably work in the major centres of employment, these routes will probably be subject to an additional 1,000 to 1,500 Otley commuters with no prospect of any improvements in road capacity. Many will continue to commute by car as the bus services are slow, unreliable and (again) under threat of cuts.

Given the answer to Question 7, what are the LCC predictions for:

11. How many of the additional Otley population will commute to work in Leeds?
12. How will the Leeds journeys be split between alternative modes of transport?
13. How many will use the A660?

- When the proposed Leeds trolley bus system is finally operational, the last leg of the journey to Leeds is likely to be quicker by this means. However, this gain will be offset from Otley by the need to transfer between buses. The proposed Boddington park and ride has a capacity of only 800, probably insufficient to meet the current potential usage.
- Similar problems apply to residents seeking to commute by rail. The trains are already very busy and the parking capacity at the stations is woefully inadequate while the Otley shuttle bus only links with some trains.
- An extended period of traffic disruption (potentially lasting ten years) will be created by the phased construction and occupation of the East of Otley development and the relief road, particularly during the initial five year period prior to the completion of the road.

RELIEF ROAD

- The only new infrastructure that is included in the Otley SAP sites is the "relief road" associated with the East of Otley development. When completed, a significant proportion of the through traffic on the Pool Road will take this route and thus avoid the town centre.
- However, this initial gain will be offset by the additional traffic generated. Some will be new traffic attracted by the existence of a new through route. More critically, the 550 new houses accessed off the relief road will themselves generate a considerable volume of new traffic on the relief road and thus onto existing roads. The latter will include (for example) new traffic heading into Otley on Pool Road.
- The East of Otley development includes 25% of employment land. This will also generate significant additional new traffic on the relief road, presumably with a high proportion of HGVs. It is possible that a new school will be built on the employment land and this would generate its own new traffic flows — both on the relief road and on existing roads such as the Pool Road.
- The relief road will also provide easy access to 1.6Mtonnes of gravel reserved adjacent to Midgely Farm allowing this gravel to be extracted and transported up the A660 into Leeds.

- Construction of the relief road will thus generate substantial new sources of additional HGV traffic. Much of this will join the existing flow of heavily loaded HGVs (including existing gravel lorries from further afield) climbing up the A660 into Leeds.
 - Given the overall volume of additional new traffic, the relief road itself will soon become busy. Critically, because it is not designed as a by-pass (the number of roundabouts and the steep gradient at the southern end), it will also be a relatively slow route for HGVs and thus for other traffic.
 - Thus, while the proposed relief road may be described as an infrastructure improvement, the apparent gain to Otley residents and others will be negated by significant consequences. These will include the impact on existing roads (like to Pool Road) and on the critical A660 commuter route.
14. Has LCC evidence to prove to residents of Otley that the overall traffic consequences of the relief road and the draft SAP development sites will be a benefit to Otley?
15. What is the predicted increase in traffic on the A660 over the period up to 2028?
16. What measures are proposed to increase the capacity of the A660 and when will they be implemented?

THE BRIDGE, PARKING AND CONGESTION

- Otley's only river crossing, an ancient monument, is a critical element in Otley's infrastructure. Recent changes, apparently permanent, to the adjacent road system relating to the ongoing Garnetts Wharfe development (a SAP site) have resulted in significant additional delays for traffic crossing the bridge.
17. Why were residents not consulted about the traffic changes made on Mill Lane?
- There is very considerable concern about the consequence of current and planned developments north of the river on delays crossing the river, particularly as development on the old hospital site is finally underway.
 - When the planned 200 new houses on the Garnetts Wharfe development are built and occupied, the bulk of additional traffic from the housing will affect the Pool Road. The latter might be expected to be a beneficiary from the relief road but the additional local traffic that will be generated by the various SAP sites suggest that this will not be the case.
 - 20% more residents, many of whom live on the outer limits of the town, will generate considerably more local traffic within the town and increased demand for parking spaces.
18. What is the plan to deal with the resulting congestion?

HOUSING

You kindly responded to recent lobbying emails, the text in italics is an extract from your reply:

"According to the 2011 census there are 2,680 children aged between 5 and 15 living in the Otley and Yeadon ward. By 2028 (the period this plan covers) these will be aged between 22 and 32. Many of these children will, understandably, want to live in the area they grew up.

Without appropriate house building in the right areas we will not be able to meet the legitimate housing need of many of the young people already living in the area."

- Your sentiment is supported but the figure of 2,680 children quoted above is somewhat miss-leading. The 2011 census gives the population of Otley Parish as 13,668 of whom 1,650 were children then aged between 5 and 15. By 2028 they will hopefully be expecting independent housing in Otley. However, the number of dwellings required will be

substantially reduced as by then many will be couples (for example 85% couples would imply the need for 866 dwellings). Additionally, some 1,345 of Otley's population was aged 75 and over in 2011. By 2028 they would be aged 92 and over so many will have died. It is less obvious just how much housing this is likely to release, but clearly the net increase in dwellings required to accommodate Otley's 2011 children would be very significantly reduced.

19. What net increase in housing numbers would be required to meet the 2028 housing needs of these 1,650 Otley children?

- As you highlight, the fundamental issue for our young people is the location, suitability and more particularly the affordability of housing. In terms of meeting the intrinsic local demand for housing, the key objectives are to building the right mix of housing with sufficient affordable housing. The current planning documents do not appear to consider what these parameters need to be in order to meet the needs of communities such as Otley.
- Unless meaningful levels of affordable houses are achieved, the planned additional houses may be of little benefit to many locals. For example the quoted proportion of affordable housing on the largest Otley development site has dropped from an "aspirational" 75% via a firm 50% (UDP) to a last quoted 15%. This suggests that such figures are little more than window dressing.
- The Local Development Framework includes a welcome new "target" of 35% affordable houses for outer areas.

20. Realistically, on which of the planned Otley development sites is 35% affordable houses likely to be achieved?

- The construction of substantial numbers of (typically) large and expensive new houses will result in a considerable influx of incomers seeking housing (rather than employment) in Otley and thus increasing the proportion of commuters.
- Census data for Otley appears to show that population has fallen by 3% from 2001 to 2011 while the number of households has increased by 2%

Population Households	13,668	6,159
Census 2011 - Otley		
Parish		
Census 2001 - Otley	14,124	6,029
Parish		

21. How is the apparent shift to smaller households reflected in the development plans?

EDUCATION

- Otley's primary schools are already full with little space to expand.

22. Where will the children from the current and proposed Otley developments be taught?

HEALTH

- Otley's GPs and dentists do not have the capacity to serve any increase in population.

23. How will LCC ensure that the capacity of these services increases ahead of the population?

SUSTAINABILITY

- The allocation of the 66,000 homes target across the 11 characteristic housing areas has resulted in a target housing density of 5.2 per hectare for Outer North West and only 2.8 per hectare for Outer North East. Both areas are similar in terms of their distance from the centre of Leeds and their poor transport links. The Outer North West area also has the 5th highest target population increase.
- Unfortunately the draft SAP also concentrates most of the 2,000 planned houses in the Outer North West area within Otley. Otley is a post-industrial market town located in Wharfedale on the extreme north west edge of the Leeds Metropolitan Area. Local employment opportunities are limited thus the inevitable consequence of a 20% increase in population will be a substantial increase in commuting on long and already congested routes.

24. Is this a sustainable development proposal?

- The planning process appears to be driven by an overriding need to identify sites for additional houses rather than the longer-term strategic need to create more sustainable and cohesive communities. For example, there is a real need to better align the spatial distribution of homes and employment and thus reduce the future need for commuting. This is particularly true of Otley with its particular geographic and development context. We are concerned by the apparent lost opportunity to achieve better long-term development for Otley.

25. How are such strategic and sustainability considerations being addressed within the planning process?

- Economic considerations, and increasingly sustainability constraints, mean that any new development is likely to remain for a considerable time — the consequence of inappropriate planning decisions will be long lasting. Potential development sites are a community asset that need to deliver the greatest benefit. There are real concerns that development proposals are often brought forward without prior community involvement in their initial concept and shaping.
- This applies equally to brownfield sites and greenfield sites. However, the supply of greenfield sites is finite — once developed they cannot be re-created. Your championing of a brownfield first policy is therefore warmly applauded.
- This is understood to ensure that 65% of new housing will be on brownfield sites during the first five years of the plan. However, in the case of Otley only 42% of the planned housing is on the brownfield sites identified in the SAP (this figure falls to 24% if current developments are excluded). Inherently it is more sustainable to develop brownfield sites but greenfield sites are usually more commercially attractive to developers.

26. Will Otley's brownfield sites be developed first?

- The ODD campaign has started to investigate more sustainable development for Otley. Otley's brownfield sites have been surveyed and other investigations are in hand. Preliminary discussions have taken place between the members of ODD Campaign, Otley Town Council and Otley Town Partnership to try and identify such a trajectory.
- Otley has many brownfield sites, both large and small, most of which have remained unused (or underused for) many years. It is vital that these sites be developed creatively, both to retain the character of Otley and to create the right balance of appropriate housing and employment. If Otley is to be sustainable in the longer-term, it needs a strategy to foster more local employment so an increasing proportion of residents can work close to where they live.

- Excluding those SAP sites in the Otley area classified as "lime green", the only brownfield sites are one classified as "red" and five classified as "green". The latter include the two most important brownfield sites adjacent to the town centre (Ashfield Works and Westgate).

27. We now have clear site boundaries for the latter two sites, is it possible to have larger scale maps of the other Otley sites?

- To date we have identified an additional 6.9 hectares of potential brownfield land. Of this 1.3 hectares are likely to be so classifiable and developable and a further 3.8 hectares may well be. We have also started to identify underused buildings that could be converted into dwellings and/or employment space. More work will be done on this when the campaign re-convenes after August including surveying how many shops are empty.

28. How can these identified sites be considered for inclusion in the SAP?

29. Does LCC have any data on unused buildings in Otley?

30. Does LCC have any data on which shops in Otley are unoccupied above their retail area and/or a policy to promote their conversion into dwellings?

31. Does LCC have any data on how many Otley homes are unoccupied?

32. Infrastructure improvements will be needed to sustain an increased population how will LCC overcome the evident problems of ensuring that appropriate improvements are delivered (and when needed)?

Given the consequences for Otley as outlined above, we respectfully seek your assistance on two potentially interconnected matters:

A. Reconsideration of the SAP as this currently impacts Otley.

B. Otley Town Council is in agreement with ourselves that a formal impact assessment of the combined effect of the planned development sites on Otley's infrastructure and transport links is required. Discussions are currently taking place to identify the scope and cost of such a study. The results would clearly inform decision making and hopefully will help identify a sustainable development trajectory for the town.

Technical and financial support from the City Council to the Town Council in relation to this study.

Yours Sincerely

The ODD Campaign

4 August 2014 oddcampaignqmail.com

Appendix 2 LCC Response to ODD Petition & Open Letter

Q1. The published timetable for the onward development lacks detail (and there have been indications of slippage). What in detail is the onward development process and timetable?

Full Council has voted to adopt the Core Strategy. This clears the way to move ahead with the Site Allocations Plan. The timescale for this is difficult to predict as it is dependent on outside factors, including the date of submission and the timing and length of public examination and how long the Inspector takes to respond to the report. However, it is our intention to move towards adoption of the Site Allocations Plan in 2016.

Q2. How will the combined impact of the proposed SAP sites be assessed during the current development of the second draft of the SAP?

Throughout the process of the preparation of the SAP, the Council has been working with infrastructure providers, including education, Children's Services, health and transport, to assess the impact on existing provision and the need for new or improved infrastructure. For transport provision, comments from the transport sector (Highways Agency, the Combined West Yorkshire Authority, Network Rail) and a cumulative impact assessment of sites currently being undertaken of the highway network will help inform the selection of proposed allocations and identify the need for associated highway and public transport improvements.

Q3. Following publication of the second draft of the SAP, to what extent will it still be possible for the public to bring about meaningful changes in the final SAP document?

We are at the very first stage of very detailed and complex work in bringing forward a draft plan, which will then be put out for full consultation.

The planning portal website has a very thorough document on the procedure of the examination of Plans, see http://www.planningportal.gov.uk/uploads/pins/dpd_procedure_guide.pdf.

Q4. Do LCC accept that (a) the draft SAP currently implies an additional 1,177 houses in Otley, (b) that the actual housing outcome on the SAP sites could be lower or higher than planned, and (c) that (inevitably) there will also be additional new housing in Otley on 'windfall' sites?

Otley is part of the Outer North West Housing Market Characteristic Area (HMCA) which has a target of approximately 2,000 dwellings. Otley, in isolation does not have a set housing figure, it forms part of this HMCA. There is also a requirement for safeguarded land, also known as Protected Area of Search or PAS land. Consequently there **may** be safeguarded sites allocated in Otley.

There are currently planning permission or existing allocations for 907 dwellings in Otley. Your calculation of 1,177 dwellings adds in the sites with a "green" indicator in the Issues and Options papers. If this was maintained through the consultations outlined above, there would therefore be in the region of 270 new dwellings in Otley as a result of the SAP.

As is established practice, there may be additional new housing in Otley on 'windfall' sites.

Q5. Given that many of the Otley SAP sites are already allocated and have developer involvements, approximately how many new houses does LCC expect to be completed in Otley (a) by 2018, (b) by 2023 and (c) by 2028?

Your group fully understands that the timing of when sites that are already allocated or have planning permission for housing will come forward and the rate at which they will be developed is uncertain. You also know that this is a matter for the developers of these sites.

Q6. What 2028 Otley population are LCC planning for?

The Council is not planning for place specific population growth. To do so would be to respond only to past trends and would not meet the requirements of national guidance to make plans which meet the full Objectively Assessed Need (OAN) for housing, alongside a balance between population growth, economic growth, infrastructure provision, environmental protection and wider policy ambitions such as regeneration.

Within the overall context of the Core Strategy, which seeks to focus the majority of growth within the main urban areas of Leeds, it is worth noting that the City Centre, East Leeds and the Inner Area will be taking the largest proportion of planned growth. These areas together form 30% of the 2012 total Leeds population, but will accommodate nearly 48% of the proposed growth. Aireborough, in contrast, with 4% of the 2012 total Leeds population, is identified as accommodating only 3% of the total growth.

Q7. How many of the current Otley population commute to work out of Otley?

Origin Destination data has not yet been released from the 2011 census. The most up to date data is from the 2001 census, which is publically available.

Q8. How many of these commute into Leeds?

Origin Destination data has not yet been released from the 2011 census. In 2001 only 11% of Otley & Wharfedale Ward residents worked in Leeds City Centre.

Q9. How are the Leeds journeys split between modes of transport?

Based on the 2011 census Otley and Yeadon ward shows the following modal split for journeys to work (excluding those who work at/from home):

Mode of Transport	Otley & Yeadon ward	All Leeds wards
Car (including passengers)	70.7%	65.0%
Bus	7.8%	15.2%
Train	4.5%	3.5%
Motorcycle	0.6%	0.5%
Cycle	2.0%	1.9%
Walk	13.7%	12.3%

The absolute number of people driving to work from Otley and Yeadon has increased by 1.3% between 2001 and 2011.

Q10. How many use the A660?

Model data from 2011 for the hour of 0800 to 0900 shows 20% of trips from Otley using the A660.

- **It is widely recognised that the A660 corridor into Leeds is already loaded beyond capacity and the routes into Bradford are no better. The inadequacy of the A660 was highlighted back in 2005 by the UDP inspector - this in the context of just the East of Otley development. More recently the A660 was "recognised as one of the most congested radials in Leeds" (2013, LCC transport document).**

For clarity, the journey time analysis undertaken was for the section of the A660 from Adel to the City Centre. The A61 (N) and A65 are also recognised as being amongst the most congested radials.

- **Given that the majority of people occupying the currently planned new houses will inevitably work in the major centres of employment, these routes will probably be subject to an additional 1,000 to 1,500 Otley commuters with no prospect of any improvements in road capacity. Many will continue to commute by car as the bus services are slow, unreliable and (again) under threat of cuts.**

This is an unproven assumption. We could anticipate some people working from home or commuting to other centres than Leeds City Centre, or indeed using improved public transport.

Given the answer to Question 7, what are the LCC predictions for:

Q11. How many of the additional Otley population will commute to work in Leeds?

See the answer above.

Q12. How will the Leeds journeys be split between alternative modes of transport?

Given the limited change in car mode share between 2001 and 2011 it is likely that around 70% will travel by car.

Q13. How many will use the A660?

Model data for 2028 shows 19% of car trips from Otley using the A660.

- **When the proposed Leeds trolley bus system is finally operational, the last leg of the journey to Leeds is likely to be quicker by this means. However, this gain will be offset from Otley by the need to transfer between buses. The proposed Boddington park and ride has a capacity of only 800, probably insufficient to meet the current potential usage.**
- **Similar problems apply to residents seeking to commute by rail. The trains are already very busy and the parking capacity at the stations is woefully inadequate while the Otley shuttle bus only links with some trains.**

One of the West Yorkshire Plus Transport Fund priority schemes is to provide additional parking at rail stations across West Yorkshire.

Q14. Has LCC evidence to prove to residents of Otley that the overall traffic consequences of the relief road and the draft SAP development sites will be a benefit to Otley?

A detailed traffic model is being produced by the developers for the purposes of assessing the impact of the East of Otley Relief Road.

Q15. What is the predicted increase in traffic on the A660 over the period up to 2028?

The models available to the Council are at an initial stage and will be further refined as the site allocations process is progressed and the position of individual sites is clarified.

Q16. What measures are proposed to increase the capacity of the A660 and when will they be implemented?

At this stage, initial modelling indicates that the following junctions would require improvement to enhance capacity. However, these are likely to require third party land and have not yet been examined for feasibility or designed.

- Dyneley Arms junction of the A660/A658
- Kings Road/A660
- Church Lane/Farrar Lane/A660

It is not possible at this point to put specific timescales on such improvements.

THE BRIDGE, PARKING AND CONGESTION

Q17. Why were residents not consulted about the traffic changes made on Mill Lane?

These changes were proposed as part of the planning application for Garnett's Mill and, as is standard planning practice, were available on public access for comment by anyone. They were implemented as part of a Section 278 scheme following direct consultation with immediate local residents and ward members took place.

The Traffic Regulation Order (TRO) to make the short section at the end of Manor Street junction of Mill Lane into a One Way section and to extend the double yellow lines was advertised and notices posted on the street lighting columns for people to comment and object to the proposals. There was only one objection to the TRO and through further consultation with the individual this was clarified and resolved.

Q18. What is the plan to deal with the resulting congestion?

Put simply, the implication of the question is not accepted.

The forecasts indicate a reduction in many traffic movements through the town following the completion of the relief road. This would enable the existing signalised junctions to be re-appraised to alleviate the additional traffic crossing the river bridge. The identification of specific schemes to mitigate additional traffic is an on-going process.

HOUSING

Q19. What net increase in housing numbers would be required to meet the 2028 housing needs of these 1,650 Otley children?

As set out in the response to Q6, the Council's approach to housing requirements in the Core Strategy and Site Allocations Plan is district-wide.

Q.20 Realistically, on which of the planned Otley development sites is 35% affordable houses likely to be achieved?

It is expected that all sites of 15 units or above deliver 35% affordable housing on site unless a viability assessment demonstrates otherwise.

Q21. How is the apparent shift to smaller households reflected in the development plans?

The shift to smaller households is embedded in the OAN for housing.

EDUCATION

Q22. Where will children from the current and proposed Otley developments be taught?

For education provision, officers from Planning and Children's Services have been working together since the start of the SAP process. Each HMCA area is being looked at to consider the proposed allocations and Children's Services are advising on the likely yield of school age children arising from the new proposed housing and how this could affect the existing schools provision (primary and secondary).

Due to changes made by National Government, Councils are not able to build their own schools as all new build schools must first be offered as academies or free schools. Leeds City Council has been critical of these changes, for precisely the reason that it makes planning and coordination of new school places more difficult to achieve.

HEALTH

Q23. How will LCC ensure that the capacity of these services increases ahead of the population?

The Council has been working with NHS England as part of the SAP process. The provision of health facilities falls within the remit of NHS England and at a local level, Leeds' 3 Clinical Commissioning Groups (CCGs). We will continue this joint work as part of this process.

SUSTAINABILITY

Q24. Is this a sustainable development proposal?

Q25. How are such strategic and sustainability considerations being addressed within the planning process?

The Core Strategy sets out its approach to the location of new housing development, with the focus on city centre, main urban area and major settlements taking the majority of new housing, this is the most sustainable approach, aligning homes with jobs and making use of existing infrastructure. The Council consider this to be a sound, justified and sustainable approach. The Core Strategy Inspector has confirmed in his report that this approach is sound.

Q26. Will Otley's brownfield sites be developed first?

The Core Strategy approach to deliver 65% of new housing on brownfield sites during the first five years of the plan is a policy that covers Leeds as a whole. In determining phasing the Council will need to have in mind this brownfield/greenfield split endorsed by the Core Strategy inspector.

The Council currently has no powers to force developers to fulfil their planning permissions.

Q27. We now have clear site boundaries for the latter two sites, is it possible to have larger scale maps of the other Otley sites?

We can email pdfs of the other Otley sites. If you would like large scale paper copies there will be a charge. Please email the Site Allocations team to confirm which format you would like them in.

Q28. How can these identified sites be considered for inclusion in the SAP?

Sites are to be submitted through the Strategic Housing Land Availability Assessment for consideration. They need to be 0.4ha or above in size and be available. Forms can be found at the following web address.

<http://www.leeds.gov.uk/council/Pages/strategic-housing-land-availability-assessment-docs.aspx>

The responses to Q29-31 are based on the Otley Town Council boundary.

Q29. Does LCC have any data on unused buildings in Otley?

The answers to Q30 and 31 provide data on residential and commercial properties that have been unoccupied for greater than 6 months (in line with definition of long-term unoccupied), but a property that is derelict will not appear on Council Tax or Business rates and will be difficult to identify.

Q30. Does LCC have any data on which shops in Otley are unoccupied above their retail area and/or a policy to promote their conversion into dwellings?

Based on the information we have, there are around 23 properties that appear to have long term unoccupied space above retailing. In addition there are 24 properties that are unoccupied at both ground and first floor level.

Q31. Does LCC have any data on how many Otley homes are unoccupied?

Yes. Based on Council Tax Data, in the Otley Town Council area there are 101 properties that have been unoccupied for greater than 6 months. The Council is a national leader in partnership working to return empty homes back into use and there is a challenging Leeds-wide target included as part of the Core Strategy totals.

Q32. Infrastructure improvements will be needed to sustain an increased population, how will LCC overcome the evident problems of ensuring that appropriate improvements are delivered (and when needed)?

This question has been answered in the responses given to the above questions.

In relation to point A the SAP will need to progress so that it is consistent with the strategy and scale and distribution of growth set out in the Core Strategy.

The publication SAP will provide an opportunity for further comment and for representations to be considered by an independent inspector. On point B as explained earlier the Council is considering the impact of its proposals as part of the plan making process. Unfortunately I am not in a position to also provide funding to communities who might wish to undertake their own assessments.

To make one point clearly again, if the proposals identified at the Issues and Options stage are reflected in the final SAP then there is very little by way of new allocations proposed for Otley.