

**LEEDS SITE ALLOCATION PLAN (SAP) REVISED PUBLICATION DRAFT**  
**SECTION 3: AREA PROPOSALS: 6. OUTER NORTH EAST**

**REPRESENTATION ON BEHALF OF ABERFORD AND DISTRICT PARISH COUNCIL**

**INTRODUCTION**

Please find set out in this letter our detailed comments in support of the enclosed completed forms relating to the Council's proposed allocation of land at Parlington Estate, Aberford under reference MX2-39.

The comments are being submitted on behalf of Aberford and District Parish Council which is gravely concerned by the nature and scale of the allocation. As a result, the Parish Council wish to object to the allocation of the site.

**SOUNDNESS AND CONFORMITY OVERVIEW**

The majority of the objection below is set out on the basis of a wide range of specific considerations, but overall, the allocation of MX2-39 is considered to be unsound on the following grounds:-

- Unjustified given the level of harm that the proposal would cause;
- Not based on a robust and credible evidence base that actually justifies the harm to be caused;
- An unreliable evidence base which includes inaccuracies such as the extent of public rights of way crossing the land and omits key information on archaeology and flood risk;
- Not the most appropriate strategy when considered against the alternatives, because of the harm that will be caused by development, relative to the alternative sites available that are more sequentially preferable. The strategy will also not support the settlement of Wetherby in accordance with the Core Strategy which places Wetherby at the heart of the Outer North East (ONE) Housing Market Character Area (HMCA);
- The Site Allocations Plan (SAP) will not be effective because it will not deliver appropriate development;
- It will also not be deliverable because it has not been demonstrated that mitigation can be delivered; and
- It is not consistent with the NPPF which aims to protect against harm.

In terms of the Plan being legally compliant, we believe the Plan is unsound because:-

- Community engagement has come too late in the process given the allocation has only just been consulted on, despite the Local Plan process being underway for many years. The Report of the Chief Planning Officer dated 19<sup>th</sup> July 2016 to the Development Plan Panel makes clear that the SAP is at an advanced stage of preparation prior to submission to the Secretary of State. Given that both Planning Advisory Service guidance and the Regulations make clear the process should be frontloaded, the introduction of site MX2-39 at such a late stage means that the communities which will be affected have not had sufficient time to investigate and consider the impacts of development. Furthermore, the report suggests that a relatively limited number of changes are being proposed through this consultation, but no

mention is made that the changes are significant and go to the heart of the Plan, given a new settlement is being proposed. What is, however, most concerning is that an updated version of the Local Development Scheme (LDS) was published in April 2016, but gives no hint that this extra consultation would be required within less than 6 months. How can the Local Plan need to include such a significant change to the strategy within such a short time frame, and it not be referenced in the latest version of the LDS? Especially, as the Headley Hall proposal was withdrawn in September 2015 and consultation was undertaken on the Sites Allocation Plan through to November 2015. In our view, this renders the Plan unsound given the need for community engagement to be frontloaded, transparent and credible.

- The Plan does not rest on a credible evidence base, given the failings of the allocation to demonstrate that the harm caused can be mitigated against. Furthermore, the Report of the Chief Planning Officer to the Development Plan Panel dated 19<sup>th</sup> July 2016 makes clear that work is at an early stage in determining the potential extent of development and how to deal with the various constraints. We believe the Council has consulted on prospective allocations within the HMCA prematurely as insufficient evidence has been developed to justify the Parlington Estate allocation or else rule out the alternative sites on the basis of a sound understanding of their development potential. This is clear from the Chief Planning Officer's Report which states that the draft allocation and the alternative sites consisting of Becca Hall Farm and Thorpe Arch are still within the early stages of being planned and developed.

## DETAILED COMMENTS

### Ecology

#### Lack of Justification/Evidence for Site Release:-

The SAP Site Requirements state that "the ecological impacts of the development will require mitigation and an ecological assessment will be required". This comment demonstrates how little or no account has been taken of the site's already well-known ecological attributes, which have been recognised by Leeds City Council elsewhere within the Local Development Framework. It also assumes that mitigation will be possible without any apparent evidential justification. As a minimum, the site's known ecological assets are as follows:-

- Two Sites of Ecological or Geological Interest within the site, i.e. Parlington Hollins and Barwick Bank;
- A Site of Special Scientific Interest (SSSI) – Hook Moor – and three other non-statutory designated sites in close proximity to the proposed area of development;
- Extensive areas of 'Ancient Woodland' habitat centred on Parlington Hollins;
- **Other UK Priority Habitats?**
- Recorded presence of protected species of brown long-eared bat, soprano pipistrelle bat, red kite, barn owl (and ten other Natural Environment and Rural Communities Act Section 41 bird species), badger and otter;
- The potential presence of other protected species such as great crested newt and water vole.

Even based on current levels of knowledge, it is difficult to see how the site could be developed, even allowing for mitigation, without unacceptable impacts upon the site's considerable ecological value.

As a result, the Plan is unsound because the evidence suggests that harm will be caused to the existing ecology of the site which is well documented. Causing harm is therefore unjustified, especially as the evidence does not refer to any evidence of appropriate mitigation to protect against the harm that will be caused by development. Without appropriate or credible evidence to justify the allocation, the Plan cannot be considered to be legally compliant.

Without identifying appropriate mitigation or even understanding whether mitigation can be achieved then it has not been identified that development of the site is deliverable. As such, the Plan is not in accordance with the NPPF, which expects allocations to be justified, deliverable and based on a sound evidence base.

#### Development Requirements:-

Before the site can be allocated, a full ecological assessment is required in order to properly understand the assets present, the likely impacts upon them, the mitigation measures available and the likelihood of their success, the scope for compensation for losses incurred and the scope for enhancement. Until such work has been undertaken, the Plan is considered to be unsound and not legally compliant with the development plan process.

#### **Landscape**

#### Lack of Justification/Evidence for Site Release:-

The site is situated within a Special Landscape Area (SLA) and also identified as part of 'The Limestone Ridge' Strategic Green Infrastructure (SGI), both by Leeds City Council itself. By the Council's own admission (Development Plan Panel – DPP - Report 19th July 2016) "the site currently performs an important role in safeguarding the countryside from encroachment".

Development of the site would clearly remove this 'important safeguard' and have an enormous adverse impact on the integrity of both the SLA and SGI. As such, the allocation is in conflict with the adopted Core Strategy DPD, and it cannot be justified. It is therefore not only unsound because it cannot be justified, but also not legally compliant because it is not in conformity with the Core Strategy.

#### Development Requirements:-

Early production of a landscape master plan will be required, to include implementation of initial phases from 'day one' in order to screen more visible site areas to be built-out in later phases.

Woodland planting will be required to achieve full screening of the site, e.g. along B1217 and to provide additional species diversity.

## Heritage Assets

### Lack of Justification/Evidence for Site Release:-

The 19/7/15 DPP Report states that “without mitigation the scale of development will have significant impact on a number of heritage assets across the site”. Such a statement assumes, as with ecological impacts discussed above, that mitigation of ‘significant impacts’ is possible, even without any current evidential justification or consideration of those assets.

There is no recognition that first and foremost, it is the Parlington Estate in its entirety which is the prime heritage asset on which this development will impact. There is evidence to suggest that a case could be made to Historic England for its registration as a ‘Historic Park and Garden’. Based on a recent assessment by a local heritage specialist/professional, the view was expressed that:-

“much of this site should be recognised as a protected park and garden and (I) believe that if we were to put in a submission for protection to Historic England, they would be sympathetic due not only to the Gascoigne connections and the grand planned estate (and how influential Kennedy was), but also to the archaeology in the landscape and the continued use and extant features from WW2”. *(NB further detail re this could be attached – ref Andrew Graham’s work)*

It is understood that Historic England actually have significant concerns about the likely impact which this development might have upon the totality of the historic Parlington environment. Historic England have submitted a representation to this latest consultation on the Local Plan and it makes clear their objection to the Parlington Estate allocation. Their objection states:-

“This development would result in the loss of virtually all the designed landscape associated with the former Parlington Hall, the family home of the Gascoigne’s before they moved to Lotherton Hall. This landscape, which, itself, is a non-designated heritage asset, provides a setting and context for a large number of designated and other non-designated heritage assets associated with the Parlington Estate.”

The sites individual heritage assets are as follows:-

- One Grade II\* Listed Building, ie The Triumphal Arch;
- Gardens House and Park House Farmhouse Grade II Listed Buildings - both closely related to the developable area of the site, as proposed by the owners/developers.

There are in addition a newly designated Scheduled Monument (Iron Age and Romano-British Settlement, south of Hungerhills Plantation) and three further Grade II Listed Buildings outside the area proposed for development, i.e. Deer Shelter, Parlington Lane Cottage and Hookmoor Lodges, but nonetheless within the site boundary which will be subject to a comprehensive management plan as proposed by the owner/developer.

The SAP offers no explanation as to how the buildings themselves and their settings are to be preserved within any development.

The site is in the setting of the Aberford Conservation Area. To quote Historic England once more:-  
“The loss of the open farmland to the west of the Conservation Area and its subsequent development would fundamentally change the rural setting of Aberford and the approach to the main body of the settlement from its southern entrance at the Hookmoor Lodges. This open area to the west of the former Great North Road is particularly noticeable in the section between the Grade II Listed Hookmoor Lodges and the Grade II\* Gascoigne Almshouses. Any development in this location would fundamentally harm the character and setting of the southern part of the Conservation Area and views looking westwards from its principal thoroughfare. Development in this location is likely to result in serious harm to the Conservation Area”.

Overall, Historic England considers the allocation to be unsound and we can only agree. The fact that a Statutory Consultee has objected on the basis that serious harm will result to a heritage asset should be given great weight in accordance with paragraph 132 of the NPPF. Especially as sufficient and appropriate mitigation has not been identified to outweigh the harm.

We also see no justification or evidence as to why the harm to the Parlington site is of a lesser degree or significance to the harm that would be caused the Becca Hall Farm site. In addition, the Thorpe Arch site would not cause any harm to a heritage asset, so would be sequentially preferable.

On this basis, we believe the allocation to be unsound. This is because we do not believe the Council has been able to justify the harm that will be caused by identifying appropriate mitigation, as there is no evidence to suggest the allocation is justified. Also the allocation is not deliverable because the harm cannot be overcome with appropriate mitigation. As a result, the harm means the strategy cannot be the most appropriate when considered against alternatives that would not cause such harm to a heritage asset by allocating land in less sensitive locations. In addition, the Plan is not consistent with the NPPF because it will cause harm to a heritage asset, which the Framework aims to prevent given the importance of heritage assets to the nation.

#### Development Requirements:-

A comprehensive heritage assessment is required in order to fully understand the importance of both the overall Parlington asset and its individual heritage elements, including the relationship with Aberford Conservation Area. Any assessment should cover the likely impacts upon them, the mitigation measures available and the likelihood of their success, the scope for compensation for losses incurred and the scope for enhancement.

The layout and of any new development must respond positively to all assets and their settings. In addition, mitigation needs to be identified that is sufficient to address the harm identified and can realistically be delivered as part of the proposal.

#### **Archaeology**

##### Lack of Justification/Evidence for Site Release:-

The SAP Site Requirements make no mention whatsoever of the site’s archaeological significance. To quote Historic England:-

“This area lies on the Southern Magnesian Limestone Ridge and in close proximity to the line of the former Great North Road. This is known to be an extremely rich archaeological area. This is illustrated by the fact that an Iron Age Romano-British settlement has only recently been scheduled just 250 metres from the site’s eastern boundary and there are also numerous sections of linear earthwork of the Aberford Dyke system to the north. This area also exhibits evidence of Iron Age/Roman fields, tracks and enclosures, and post-Medieval trackways, coal workings/bell pits and quarries”.

Local finds in the immediate vicinity include:-

- an Anglo Saxon ring, from the ninth century. This artefact is currently housed in the British Museum inscribed with the name of Æthelswith, the sister of King Alfred the Great;
- the ‘West Yorkshire hoard’, found in Aberford a few hundred metres from the site boundary, comprising numerous Anglo Saxon gold artefacts and described as, “a jewel in the crown of the museum’s collection”

The historic battles of Towton and Bramham Moor also took place in the vicinity.

There is a high probability, therefore, that there will be archaeological remains of national importance within and around the site of the proposed new settlement. This is a constraint to development which requires investigation as part of the evidence to justify the allocation of the land. Given no investigation work has been undertaken and there is nothing in the public domain on the matter, despite the probability there are remains, the Plan can only be considered to be unsound.

#### Development Requirements:-

A comprehensive archaeological evaluation of the site needs to be undertaken in order to fully understand the archaeological importance of the site. Any assessment should cover the likely impacts upon archaeological remains, the mitigation measures available and the likelihood of their success, the scope for compensation for losses incurred and the scope for enhancement and in-situ preservation of key remains wherever feasible. Without such work, we consider the Plan to be unsound.

#### **Highways**

##### Lack of Justification/Evidence for Site Release:-

Multiple linked points of access from the adjacent road network, as set out in SAP Site Requirements and likely to be required by the Highways Agency, would inevitably involve an access onto Bunkers Hill/Main Street, Aberford. This would result in unacceptable traffic levels and increased congestion on this minor road through the heart of Aberford village. Alternatively, a single primary point of access onto the B1217, as proposed by the site owner/prospective developer, is likely to result in unacceptable traffic levels at M1 Junction 47, A642, B1217, Bunkers Hill/Main Street and surrounding roads as traffic seeks alternative routes to avoid the Junction 47 bottleneck, particularly when combined with the traffic impacts of proposed housing allocations east of Garforth.

The Report of the Chief Planning Officer to the Development Plan Panel dated 19<sup>th</sup> July 2016 states a transport planning exercise will be needed to confirm the details of the road network and public transport enhancements needed to mitigate this major site. Development will not be deliverable without being able to demonstrate safe access can be achieved where traffic flows can be accommodated within the existing highways network or through improvements. For this reason, we do not believe that the Plan is sound because there is no robust and credible evidence to justify the proposal and to demonstrate the proposal is deliverable.

In addition, the Thorpe Arch site has established highways links and the impact is quantifiable, unlike at Parlinton where there are no firm plans as yet. As such, the Thorpe Arch site is sequentially preferable and would be a more appropriate alternative to the Parlinton allocation. The Plan is therefore unsound on this basis.

#### Development Requirements:-

A comprehensive traffic assessment is required in relation to the Parlinton and Garforth allocations in order to properly understand the cumulative impacts on the existing and any future proposed road network. Development should not proceed if demonstrated impacts cannot be satisfactorily mitigated. However, such information is required before the allocation can be made as the Plan should ensure all development is deliverable.

If development proceeds, all necessary highways improvements to be delivered upfront before any housing etc. construction commences on site.

#### **Public Transport**

##### Lack of Justification/Evidence for Site Release:-

Given the objection on Highways etc. grounds, the linked accesses required for public transport purposes, by SAP Site Requirements, could only function on limited public transport (and emergency vehicle) access basis, with automatic barriers to control access/egress. On this basis the Plan is unsound because the proposal cannot be considered to be deliverable.

##### Development Requirements:-

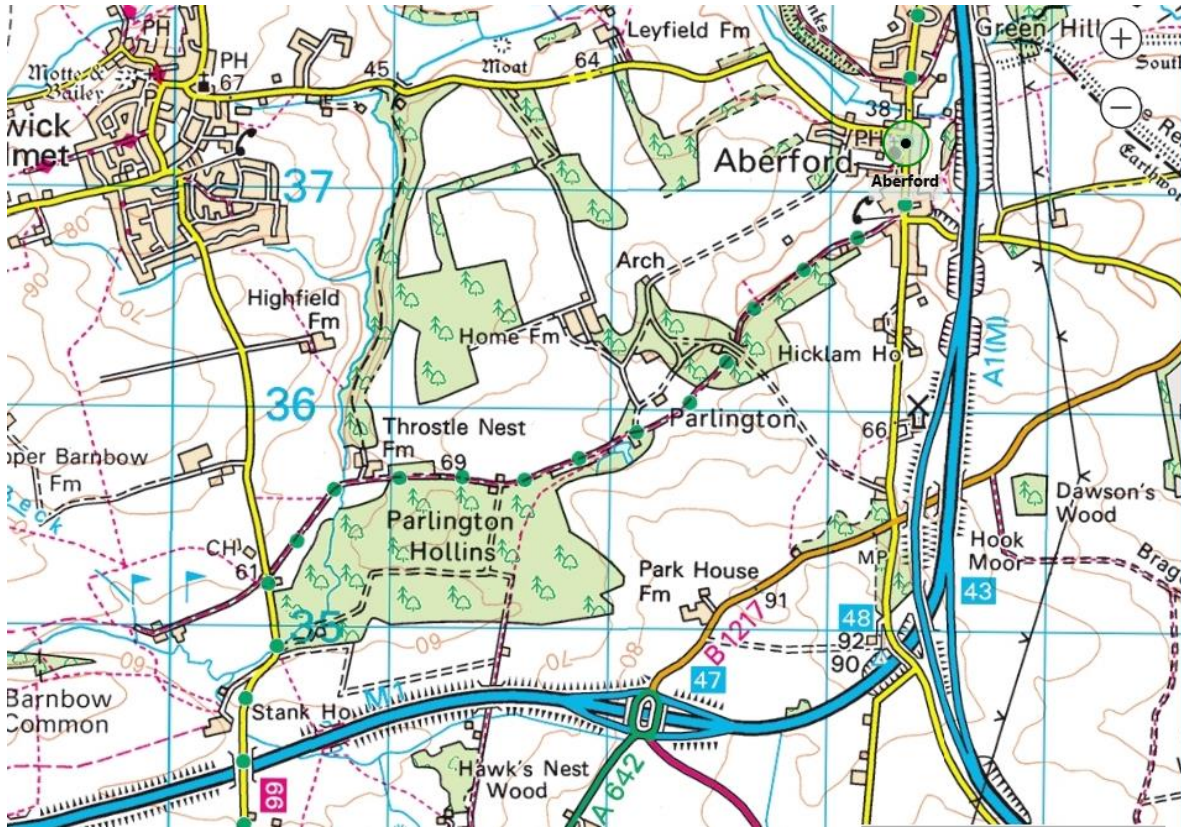
A comprehensive public transport planning exercise should be undertaken to confirm details of the public transport enhancements needed to mitigate development and connect Aberford village to the newly created facilities and job opportunities. It should be demonstrated how development will be connected to the existing public transport network. Also, all new and existing bus services should be required to connect the site to Aberford village with improvements introduced to the frequency (early morning, evenings, weekends) of existing services. Alongside, provision of new routes/services, including to Garforth Rail Station.

#### **Cycling/Footpath Network**

##### Lack of Justification/Evidence for Site Release:-

We are most concerned that the Chief Planning Officer's Report to the Development Plan Panel dated 19<sup>th</sup> July 2016 states under paragraph 3.22 that the land is currently private with no public

rights of way through it when in fact there is an existing network of public footpaths and cycle routes crossing the site, as shown by the pink dashed lines and green dots on the excerpt of an OS map below.



This means the Plan is unsound because the evidence base is flawed given the inaccuracy of the statement in the Report to the Development Plan Panel.

The presence of these routes means that development would have an unacceptable impact on some of the highest quality accessible landscape in Leeds, due to footpaths and National Cycle Route 66 crossing the site at various points.

#### Development Requirements:-

The existing routes should be protected, and a series of new routes or bridging of gaps in existing routes introduced to encourage people to walk and cycle. The opportunity should also be taken to require the developer to improve any deficient sections of the networks. Only minor re-routing of footpaths to reduce visual impact of development on Public Rights of Way Network, where screening not feasible, should be allowed.

In particular, we would like to see improvements to public footpath from Parlington to Garforth Station to create a combined footpath/cycle route.



## Loss of Green Belt

### Lack of Justification/Evidence for Site Release:-

Of all the considerations for determining the selection of sites, Green Belt designation is one of the most important given the national significance of the designation. We are therefore most concerned to learn that despite the Council concluding that “Development of the site would create a significant incursion within the Green Belt and the site currently performs an important role in safeguarding the countryside from encroachment.” (ref LCC DPP Report 19/7/15), the intention is still to allocate the land for development.

Our concern is only extended given the Council’s findings that “No merging of settlements will occur, but it would reduce the Green Belt gap between (the) settlements (of Aberford, Barwick-in-Elmet and Garforth).” (ref LCC DPP Report 19/7/15). We actually believe this statement does not fully represent the true impact of developing a new settlement on Parlington Estate on the Green Belt. This is because the proposed allocation will be only 500m from Barwick-in-Elmet and not much more to Aberford. With such short distances between existing settlements and the proposed new settlement at Parlington there will be significant adverse impacts on the fundamental aim of Green Belt policy, as well as protecting the purposes of the Green Belt. This is because such short distances do not represent sufficient protection to ensure towns will never physically or visually merge.

The presence of tree belts between the settlements will not prevent the settlements from being read as one from a distance, so the extent of the urban conurbation of Leeds will appear to be much greater than at present where two small villages will have the potential to read as one large town from a distance. In addition, development at Parlington represents the unrestricted sprawl of the conurbation of Leeds, due to the cumulative impact the allocation of Aberford together with Parlington and Barwick-in-Elmet will have on what currently appears as open countryside. In addition, a further 5000 dwellings together with the scale of Barwick-in-Elmet will result in a scale of development that will truly see the countryside encroached upon.

Page 25 of the consultation document includes a plan of the extent of the proposed allocation, and this clearly provides an indication of the likely visual impact on the Green Belt if development is allowed.

Given LCC’s own views on this as quoted above, it is very difficult to understand the justification for release of this site from the Green Belt. Especially, as we have seen no supporting evidence to justify the release of Green Belt land to allow for the allocation. Whilst the Green Belt Review Background Paper has had the references to the site amended, there does not actually appear to be any assessment of the Green Belt credentials of the site. As such the removal of the site cannot be considered to have been fully justified. In fact, the Green Belt Review Background Paper does not provide sufficient justification for any of the exclusions as there is no detailed assessment for each site. We would expect to see a detailed appraisal of the landscape qualities of each site to be excluded to have been subject to an assessment in accordance with the ‘Guidelines for Landscape and Visual Impact Assessment’ (Landscape Institute & the Institute of Environmental Management & Assessment, Third Edition 2013), ‘Topic Paper 6: Techniques and Criteria for Judging Capacity and Sensitivity’ (The Countryside Agency 2004). We have, however, found no such assessment available

for inspection. Without such an assessment we cannot see how the Plan has been prepared on a robust or credible evidence base, or it can be considered to be fully justified. Given the significance of the Green Belt, the proposal is also not legally compliant with the NPPF without comprehensive assessments.

#### Development Requirements:-

The Local Plan needs to ensure any proposal respects the attributes of Green Belt and sufficient mitigation is introduced to ensure settlements cannot in future merge.

#### **Flood Risk/Surface Water Drainage**

#### Lack of Justification/Evidence for Site Release:-

The SAP Site Requirements make no mention whatsoever of the flood risk and surface water drainage implications of site development despite this forming an important element of demonstrating the site is deliverable, and is usually a standard part of the evidence base.

Both the Cock Beck and River Crow are the sources of existing flooding problems in Aberford village, with flooding recorded in 2000, 2008 and 2014:-

- The Cock Beck floods the Beckside area of central Aberford;
- The River Crow also breaks its banks in central Aberford and east of the village before it joins the Cock Beck;
- River Crow culverts within the Parlington Estate have collapsed and 'flood ponds' are silted-up;
- The ornamental lake on the estate is silted-up thereby reducing its storage capacity.

The proposed development will introduce impermeable areas and considerably reduce the green field areas that currently permit rainwater to infiltrate into the ground. This will increase rainfall runoff rates from the site in the direction of Aberford village, further exacerbating existing flood/drainage problems.

The representation submitted by Aecom in March 2016 suggests further master planning work will be required to develop a suitable strategy to identify the most appropriate solutions. However, this means there is no evidence to demonstrate how development will be deliverable. No mention is made to drainage within the SAP consultation document, which we believe is a serious omission given the lack of information on the matter submitted by the Aecom.

As a result, the Plan is considered to be unsound. Given the significance of drainage as a potential constraint to development, it is considered that the proposed allocation is not compliant with the NPPF because the site has not been demonstrated to be free from surface water flooding.

#### Development Requirements:-

A full investigation of current site drainage, modelling of the impacts of development (notably on the Cock Beck and River Crow), mitigation options and their likely success and measures to improve current drainage/flood problems emanating from within the Parlington Estate.

Water runoff from any new development site will not exceed the 'greenfield' runoff rate.

Any development will be fully expected to result in wide public benefit to existing Aberford residents, in terms of the resolution of all existing water management and flooding problems, the source of which lies more or less entirely within the current Parlington Estate.

Any interventions in site drainage must only be done where there are no adverse impacts on local ecological assets as a result.

## **Agricultural Land**

### Lack of Justification/Evidence for Site Release:-

The SAP Site Requirements make no mention whatsoever of the loss of agricultural land as a result of site development despite this being a key consideration of the NPPF. The Framework expects the best and most versatile agricultural land to be protected. Site development would result in the irreversible loss of this high grade agricultural land.

The site's farmland is predominantly Grade 2, with some pockets of Grade 3. As such it is classified as the best and most versatile and should only be developed if more sequentially preferable land is not available. This constraint does not appear to form part of the assessment of the site, which means the Plan is unsound because it is not compliant with the NPPF, there are alternative sites which would cause less harm and the Plan will not be effective in protecting an important agricultural resource.

### Developer Requirements:-

The Council is required to undertake a sequential assessment and include reference within any site selection methodology to ensure the best and most versatile land is protected, and lesser quality land is released in preference to land such as that at Parlington Estate.

## **Minerals**

### Lack of Justification/Evidence for Site Release:-

The SAP Site Requirements make no mention whatsoever of the small part of the site to the south of Parlington Lane which falls within a Minerals Safeguarding Area relating to coal.

Should the owner/developer choose to remove the coal in advance of any development of the site for housing etc. purposes, this would result in an additional adverse impact upon local residents and the local road network.

### Developer Requirements:-

No development should be allowed until the full potential of the land for the extraction of minerals has been completed and any minerals present have been removed. Any restoration following coal removal to provide flood/surface water attenuation measures in relation to the development site.

## **Local Services/ Facilities**

### Lack of Justification/Evidence for Site Release:-

Whilst there is mention that a new village centre will be provided along with a primary school, there is no real detail as to what will be provided. We therefore do not believe the proposal is deliverable because no financial viability work has been produced to demonstrate that development of circa 2000 dwellings within the Plan period can afford to provide a new village centre, plus primary and potentially secondary school. Especially as there is also no assessment of whether there are any abnormal costs for the development to bear. Without such evidence, the proposal cannot be considered to be sound as the Council has not been able to demonstrate development is deliverable.

### Developer Requirements:-

Upfront delivery of all social/community infrastructure.

Education – provision of primary and secondary schools on site.

Town Centre – *Nb specific requirements? Facilities to be included?*

Retail/commercial uses/services – *Nb specific requirements?*

Greenspace/parks – new provision to take full account of deficiencies already identified for Aberford and the wider Outer North East by LCC in its 2011 Open Spaces and Recreation Assessment.

## **Employment**

### Lack of Justification/Evidence for Site Release:-

We have seen no evidence to justify or establish whether businesses would wish to be located within this part of Leeds, or if development of employment opportunities here would detract from the economic viability of existing development elsewhere, such as found in Garforth. Without such an impact appraisal the Plan cannot be considered to be sound because it has not been evidenced that the Plan will be effective.

### Developer Requirements:-

The Local Plan needs to make clear what kind of employment opportunities will be considered acceptable within this location in order to protect the economic viability of businesses elsewhere.

## **Housing Mix**

The Parish Council wish to make clear how the housing mix should reflect local housing need. The Council and the developer do not, however, appear to have undertaken any assessment as to the likely mix of housing types to be provided. As such, a standard density has been applied that does not take account of the ability of the site to actually accommodate the level of development proposed.

This means there is no real understanding as to whether the site will actually help deliver the Core Strategy in terms of housing numbers and housing mix to meet housing need. This oversight means the Plan will be ineffective because there is no real appreciation as to whether the SAP will in reality deliver the necessary number of houses to meet housing need.

Developer Requirements:-

Provision of housing mix to ensure needs of local Aberford Parish residents, in terms of smaller households and the needs of older people, are fully met. This requires a masterplan exercise to understand the capacity of the site and its ability to respond to housing need through the provision of an appropriate mix of housing types.

**Aberford Neighbourhood Plan**

All of the above needs to be set within the context of emerging Aberford Neighbourhood Plan policies.

The Neighbourhood Plan has already been through 2 rounds of informal public consultation and is expected to undergo statutory Regulation 14 consultation during March/April 2017. An informal draft for SEA and HRA screening purposes will be available by December 2016.

**CONCLUSION**

Any one of the major issues raised above, be it 'Ecology', 'Heritage', 'Archaeology', 'Green Belt' or 'Highways/Transport' is sufficient in and of itself to justify the deletion of the proposed Parlington development site from the SAP. Taken together and in concert with the many other issues raised, the argument against a new settlement at Parlington is incontrovertible. Especially, as there are at least two alternative sites that could provide for a new settlement without the same level of harm.