Further submissions to the Main Modifications: 16 April 2016

If you look at the increase in housing in Bradford over the last 11 years there is only an extra 15,000 extra homes built that is 1,500 per annum, this over 15 years equals 22,500 {see below}all planned to gain more money from higher taxes from the outskirts of Bradford to fund the City. The figure of 42K was based on 4.2K new jobs now downgraded to 3.6K in the latest deposit to the inspector.

I would be looking at any options to reduce the 42,000 new homes to the level and to places that need the homes recognising that the basis upon which it was calculated was flawed as listed below.

Increases in population in Bradford have peaked and slowed down therefore the projected figures which were based on the 2012 census are now the wrong base line.

When all 5 West Yorkshire council labour leaders agreed that each authority would deal with own the proposals separately, one asks why do we have the WYJA? If decisions' like this are made when clearly the housing and commercial space is more available in the flat lands of Leeds and Wakefield. Not in the outer hilly districts of Bradford where travel to work will be too expensive for low paid workers and be more travelling equals more pollution. The figures were not based on needs or practicality and the increasing cost of travel to work costs which will be too high for the lower paid and also increase carbon levels and endangering the Environment.

Regrettably or fortunately the flooding has brought the house site on Countances way into another error of judgement as this area was underwater. Suggest similar issues are apparent in Craven and Keighley and the Wharfe and Aire Valleys. Council is 2 years late in submitting a flood risk analysis so the Core Strategy based on wrong information. Photos available.

Only using 50% of the Brownfield land for Housing when Government require 80% using equals around 5000 more homes possible in the industrial towns where it is needed. We still have not a register of our Brownfield lands, on announcing the Brownfield support fund Gove asked councils to start a register before the fund becomes law. The controlling group Port folio holder for Housing stated in a recent council mtg stated "she will not start until it is law" therefore wasting important months. So in the meantime the figure is based on the SHLAA which reflects too few homes on Brownfield sites.

Council never measured the number of unoccupied homes above what are now lock up shops, Along all our main roads and central shopping areas across the district this must on a small sample equate to 4000 new homes at least across Bradford District and these were not included in the core strategy. Neither included in the figures are the huge number of student accommodation planned for Bradford City.

In West Yorkshire 77,117 homes stood empty last year, 27,058 empty for longer than 6 months. On a per capita basis this is 18,480 in Bradford and or 6480 for over 6 months. Why are there no improvements to make them occupiable if that that what is needed. At present there are 4,800 homes with planning permission but not yet built, so come on Builders get on with it, they are waiting for the level of the value of the land to outpace their costs of acquiring the site before development commences.

Planning more homes the outer district of Bradford are where the developers want them as they will sell for a higher price and the Council wants them there because they have higher rateable levels therefore more income of the City. Homes are needed in the City and would help the regeneration of the City

Lets take the Core strategy new homes number claimed of 42,000 by 2030. Then say possibly less 6480 long term empty, the possible 4000 homes reclaimable over lock up shops, 4800 homes already with planning permission, Brownfield increase to 80% + 5000. Already we have arrived at 20,280. newly found plus the 1000 windfall homes built in Ilkley over the last 12 years then 21,280 from 42K = 21K required across Bradford not 42K.

Conclusion; Taking into account the supposed 8000 on the waiting list [say 2000 moving home]say 6000 then we need to find around 21000 new homes by 2030 not 42K in Bradford overall and not in our GREEN BELT. Also we know that the Transport infrastructure is insufficient at present, as well as schools to accommodate 21K new homes never mind 42K. CIL will not be sufficient to fill in the gaps and in fact Bradford is still operating on Sect 106 policies.

Fill in the spaces in the City where work and access to jobs are and transport is available not in the green belt where it is expensive to live and travel, as the government says.

Developers should not be building homes in the greenbelt when low cost homes could be built in the city. Use the Brownfield government grants before they are taken up by other authorities. Already some Councils are buying up older houses, [only 26 last year in Bradford], upgrading them and selling them on at a profit so why are Bradford so little?? This is an opportunity and why when other authorities have bid for the Brownfield fund already when Bradford have not done so, because we have not prepared a list!!!!

If Bradford was positive and far sighted not just saying "if further government guidance is forthcoming we will respond" then we may get a Core Strategy that has some cohesion and reality.

Cllr Martin Smith opp spokesman on Housing Transport and planning 16^{th} April 2016

965 words