

## **BRADFORD LOCAL PLAN - CORE STRATEGY MAIN MODIFICATIONS**

### **FURTHER HEARINGS - MAY 2016**

#### **Further Statement by Addingham Civic Society**

##### **Preamble**

Addingham Civic Society (ACS) wishes to make a further statement in relation to the Matters, Issues and Questions identified by the Inspector for discussion at the Further Hearings.

As with the Society's previous representations, the focus of interest is naturally how the Core Strategy impacts on Addingham village and environs. However ACS is also concerned about Core Strategy proposals affecting other settlements and the environment of Wharfedale, including Ilkley, Burley-in-Wharfedale and Menston.

##### **Proposed Modifications and MIQs**

The Society's detailed representations on the original Core Strategy and proposed Main Modifications remain relevant, and are not repeated here. However ACS requests that the following comments are taken into account in relation to specific aspects covered in the current MIQs.

##### Matters 2 and 3 - Settlement Hierarchy and Spatial Distribution

###### (a) Housing Allocations

The MIQs wish to examine whether the revised housing allocations for Ilkley, Burley and Menston are justified, soundly-based and appropriate etc.

As set out in the Society's earlier representations, allocations to these settlements cannot be considered separately from the issue of the overall District housing requirement which has been heavily criticised and undermined by many groups, based on very clear and demonstrable evidence.

The grossly inflated and over-estimated housing requirement for Bradford District has been further highlighted in the recently-produced report of the Local Plans Expert Group (LPEG) set up by Government to examine local planning policy and practice (Local Plans Expert Group – Report to the Communities Secretary and to the Minister of Housing and Planning, March 2016).

**This official report identifies Bradford District as not only an authority which over-estimates its housing requirement, but one of the few which does so by the largest amount – i.e. by more than 500 dwellings per year (Fig1 Page 11, LPEG Report).**

Over the Core Strategy plan period, this equates to an inflated housing target of some 8,000 dwellings, an over-estimate of almost 20%. ACS considers this official evidence-based report to be a further powerful demonstration that Bradford's housing requirement is unjustified and that the resulting plan is UNSOUND.

The inflated and unjustified housing requirement has a further critical impact on the Plan, particularly regarding the need for green-belt releases. The current proposal is to remove 135 hectares of green-belt land to provide sufficient sites to meet the projected housing requirement. The land requirement for 8,000 dwellings equates to over 250 hectares, based on an average density of 30 dwellings per hectare (as set out in the Housing section of the Plan). Given the Plan's stated objectives of prioritising brownfield land for development, in accordance with national policy/guidance, this lower land requirement would remove the pressure for release of green-belt land, which is a feature of the current proposals particularly for Wharfedale settlements. Indeed, it is considered that the great majority of the District's "true" (realistic) housing requirement could be met without significant green-belt releases.

It is noted that the National Infrastructure Development Plan 2016 sets out that 90% of identified suitable brownfield land should have planning permission for housing by 2020/21, which would support this focus in Bradford and Keighley, which have significant numbers of brownfield sites.

Wharfedale settlements would then cater for a more appropriate and organic scale of growth, minimising wherever possible the loss of green-belt land and safeguarding as far as possible the unique environment, amenity, tourism and economic attributes of the valley.

**ACS requests that the Inspector takes the LPEG evidence fully into account, along with information previously submitted, and to instruct the Council to make the appropriate revisions.**

(b) Flooding

The MIQs ask whether the revised spatial distribution "properly reflects policy constraints (e.g. green-belt) and physical constraints such as flooding....."

Previous representations fully cover the Society's concerns about allocating new housing sites without a full understanding and appreciation of flood risks in Wharfedale. Incidents in Addingham, Ilkley and elsewhere in the valley over the recent winter months again demonstrated the problems clearly.

Recent research and investigations by associated Wharfedale amenity groups have identified serious gaps in Bradford Council's information on flood-related issues, deficiencies regarding co-operation with other relevant agencies, and delays in producing necessary management plans and proposals.

These problems are covered in more detail in representations to the current MIQs from other groups, and are endorsed by ACS.

