

# Bradford Local Plan Core Strategy Examination 17-20 May 2016

Submitted by Adrian Naylor ward Councillor Addingham and Silsden on behalf of himself and Silsden Town Council and Addingham Parish Council.

I confirm that I would like to participate in the above hearings.

The basis for Bradford's assertion that it needs circa 42,000 additional houses is based in part on workforce growth. Bradford has accepted that it has overstated this growth and has revised the figures downwards, however, it has not made the corresponding change to the housing numbers which should be reduced accordingly. This reduction would reduce the need to impinge on rural habitats and the Green Belt.

## **Matter 1 South Pennie Moors**

The arbitrary nature of the revision to this brings into question the robustness and soundness of the policy as increases in the housing numbers for Silsden and areas in the Wharfe valley appear to be more a case of redistribution of housing numbers from other locations such as Canal Road and Howarth than a sound evidenced based approach.

This view is reinforced by the speed of the change rather than Bradford's usual approach to making decisions. The implications of the changes have not been reflected nor has the impact on settlements been fully considered or explained.

## **Matter 2 Revised Settlement Hierarchy**

The revision to Burley-In –Wharfedale and Menston will have a cumulative impact on the infrastructure in the valley especially transport and secondary education. The proposed revisions are hasty and ill considered and will adversely impact on other settlements such as Addingham in regard to the provision of secondary education.

## **Matter 3 Revised Spatial Distribution of Development**

Airedale: The increase in Silsden from 1,000 to 1,200 does not reflect the physical constraints of the road system and transport infrastructure in general, in fact the change appears to be more an exercise in compensating for reductions elsewhere. There has been no robust work carried out for a relief road as required by the inspector who oversaw the RUDP.

The recent flooding in December 2015 demonstrated that Bradford and the Environment Agency do not have an up-to-date understanding of where was flooded and the type of flooding that occurred. The concept of building on or adjacent to a flood plain appear to be a fundamental weakness in the overall core strategy. When this is combined with the runoff water from the uplands there appears to have been no consideration of the recent practical consequences.

The impact of cross boundary working is negligible. Bradford's Community Infrastructure Levy is supported by the Infrastructure Implementation Plan ( IIP) which highlights that Yorkshire water confirm that the Airevalley Trunk sewer is at capacity and cannot take any additional housing. This is a sewer which originates in North Yorkshire and so is impacted by housing across the border since the document was published several hundred additional houses have been given planning permission without a substantive and robust plan being created.

The electricity sub station in Silsden is also referred to in the IIP and requires a major upgrade no robust planning has taken place regarding this matter.

The RUDP inquiry ,over 10 years ago, concluded that an eastern relief road was required for Silsden prior to building in the eastern side ,however, no planning regarding its route , cost or potential funding etc. has taken place and as a result no strategic planning regarding transport has taken place. There is little realistic expectation in delivering such a ring road in the current plan period.

In conclusion it is apparent that there has been little or no planning for infrastructure, flooding, transport or habitats in these modifications they appear to be no more than a redistribution exercise to compensate for reductions elsewhere. The overall housing numbers are flawed as revised workforce growth figures have not been reflected in the housing numbers if they had the then these revisions upward would not be required.

The type of housing suggested for the Wharfe Valley and Airedale appears in the main to be 4/5 bedroom. Bradford argue that a large part of the need is driven by young families etc. this 4/5 bedroom provision will not meet this need and given the lack of high value employment those buying any houses in this area will have to commute adding to the transport problems.