

### **Matter 3. Revised Spatial Distribution .**

#### **b. Airedale Silsden increase of 200 Dwellings**

##### **SUMMARY**

- NO UPTO DATE FLOOD RISK ASSESSMENT IN PLACE
- NO HYDRAULIC MODELLING OF THE FLOWS OF SILSDEN BECK HAVE BEEN DONE RECENTLY SINCE THE FLOODS OF DEC 2015
- DRAINAGE SYSTEM IS ANTIQUATED AND IS IN URGENT NEED OF ATTENTION, {combined sewer overtops into beck and subsequently River Aire}
- ROAD INFRASTRUCTURE IS POOR
- A RELIEF ROAD IS NEEDED BEFORE ANY MORE DEVELOPMENTS PARTICULARLY TO THE NORTH AND EAST OF SILSDEN TOWN CENTRE
- EDUCATION - SCHOOLS ARE AT CAPACITY
- NO INCREASE IN JOBS LOCALLY OVER THE LAST 5 YEARS
- ELECTRICITY - POWER SUB STATION NEEDS UPGRADING.

No S106 or other funding is in place in the short to medium term to address the investment needed in Drainage, Sewage capacity, Power supplies. No other planned area of development within the Bradford District needs such as high level of infrastructure improvements to be sustainable.

##### **Airedale 1.**

Taking into account the infrastructure comparison of Baildon, Regional City of Bradford etc, difficult to understand why an addition has been made to Silsden as a result of the HRA.

Silsden needs considerable infrastructure investment, since the inception of Bradford Metropolitan Council in 1974, Silsden has had little or no significant investment regarding highway improvements, drainage, jobs, education, sport and recreation, transport infrastructure and as a result of the core strategy investigations we also find has insufficient electricity supply capacity for any more than another 100 dwellings.

In comparison Bradford city has enjoyed considerable investment in these features to promote the developing centre to encourage local employment centred around the recently completed Broadway shopping complex. To ensure the success of the centre and increase footfall, minimising commuting is preferable and practical to maximise the number of dwellings in the Regional City and support businesses paying Bradford rates.

A number of office conversions to dwellings have begun in the city and this trend might continue, . HMRC are relocating its 3 offices to Leeds the reasons put forward would equally apply to the private sector demand for office space away from the principal motorway network is low.

All the availability for redevelopment of Brownfield sites and conversions has not been included in the apportionment to the Regional City of Bradford.

Shoppers have a choice and look for maximum choice in retail offerings, commuting from the furthest extremities of the district is inefficient and competes directly with the easier accessible offerings in Skipton, North Yorkshire and Leeds, there is nothing to significantly differentiate an advantage for Bradford Centre over these other retail offerings.

Within the last 40 years significant upgrades have been made to the sewage and top water capacity, particularly Bradford, Lower Baildon and Esholt.

The floods of December 2015 highlight the existing problem of poor drainage in the Silsden area of catchment. Which now needs addressing as an immediate priority before any further development is allowed, even the small development of 26 dwellings on Middleway has caused flooding problems lower in the town below the park.

**The combined sewer overtops at Mitchell Lane, St John St, Keighley Road near the old tip near the river bridge} into the Silsden Beck and subsequently into the River Aire during periods of heavy rainfall. In addition problems at Kildwick Bridge to the West increased the flooding further downstream at Stockbridge in Keighley where over 300 homes were flooded on Boxing Day 2015.**

Since the earlier comments put forward a recent decision by the Regulatory and Appeals committee on Thursday 7<sup>th</sup> April needs to be taken into account regarding Flood Risk and Actual flooding experienced in Silsden Dec 2015.

The minutes are not yet available however decision was to defer decision until updated robust information was available, briefly as follows;

- 1} A fully updated FRA for the application including investigation and record of flooding event of Dec 2015 including mapping
- 2} A detailed hydraulic flood modelling assessment of Silsden Beck, specifically to also include the flood barrier effects of Kildwick Bridge.
- 3} Clarification of the developers proposed solutions for the long term management of any flood management assets

Full decision can be viewed at;  
[democracy.Bradford.gov.uk/documents/g5755Decisions%2007<sup>th</sup>-Apr-2](http://democracy.Bradford.gov.uk/documents/g5755Decisions%2007<sup>th</sup>-Apr-2)

Yorkshire Water indicate that the Aire Valley Sewer is at capacity and can take no more significant discharges, a feasibility study to increase capacity is still to be completed and funding allocated for improvements.

The capacity increase required is to accommodate new developments, existing customers should not have to fund any potential upgrade, however no S106 MONIES have been allocated towards this or the improvements to the Sub station for electricity upgrades.

A strong case exists to not increase or reduce the number of new residential dwellings allocated to Silsden until the overdue significant infrastructure improvements are in place namely;

- Relief road incorporating new drainage both sewage and top water to take pressure off the existing antiquated system in Silsden centre and feeder streams.
- A storage system incorporated with the development of the proposed sites at the South of Silsden to address the extra loading on both the River Aire catchment and the Aire Valley Main Sewer
- Replace or repair sections of the existing drains, such as those on Mitchell Lane
- Existing highway repairs in conjunction with the above repairs {note Silsden is only allocated £110,000 on highway repair/re-surfacing in Year 2016/17 Ref; Keighley Committee 14/04/2016}
- Upgrade in capacity of the sub-station
- A SIGNIFICANT increase in local jobs to minimise commuting to areas outside Bradford

- Bridge over the A629 to access the rail station at Steeton {with ramps} located to the East of Steeton Roundabout
- Improvements to access the East bound rail platform, similar to those access arrangements applied at the recent development at Apperley Bridge rail station
- Re alignment of the footpaths on Keighley Road from Belton Road junction to the A629, provision of cycle lanes
- Provision of a replacement Primary school, including retention of swim start facility and sporting facilities
- Restoration and improvement of dilapidated public buildings {lack of maintenance} buildings in Silsden Park and Silsden centre
- Provision of improved facilities for sports and health

*Estimated cost for the above is £25million plus*

*Previously inspector report stated that the by-pass relief road should only be provided if it could be built in its entirety as one project. It is unlikely the funding will be available in the short term to do the complete project from Belton Road to the North of Silsden above Tannery Corner.*

*Note one developer has already offered land on his site South of Silsden, and it would be feasible to develop as far as Brunthwaite Bridge in conjunction with Canal and River Trust and other partners.*

*This could then link in with the existing mature development on Waterside, relieving commuting traffic from Clog Bridge, a current bottleneck at peak times in central Silsden.*

## **11.POLICY CONSTRAINTS**

The amended distribution does not properly reflect policy constraints

**PHYSICAL;**

**FLOODING** - Bradford is the lead flood authority for the district, flood risk assessments should be up to date and regularly reviewed, along with emergency plans, as previously mentioned

The Bradford Flood Risk Assessment for Silsden is out of date and does not take into account the flooding on the bank holiday Boxing Day December 2015, when due to lack of council resources local residents had to put temporary prevention measures in place themselves.

At the Regulatory and Appeals meeting on 7th April 2016, Council officers when questioned by elected members confirmed that The Flood Risk Assessment and Hydraulic modelling for Silsden Beck in the river Aire catchment zone was not up to date and did not take into account the flooding in December 2015, the application was deferred for further information, officers requested the applicant to do this work however as this could equally be APPLIED to all proposed sites in Silsden, the flood authority should have their own document which it was expected would take at least 3 months to produce.

Elected members requested that ALL sites that are in future put before them for consideration should be accompanied by a comprehensive FRA {Flood Risk Assessment}, without which taking into account the flooding of Dec 2015 both within Silsden and further downstream in Stockbridge etc, they would be failing in their duty to protect and minimise risk to their constituents within the district. Officers agreed to address this need for FRA,s and inform future applicants before they came to panel.

It was also agreed to liaise with the upstream flood authority North Yorkshire where a flood alleviation scheme has commenced to protect the town of Skipton. {Extensive work on the streams and culverts both in and around the town in parallel with housing developments no similar .... preventive measures in Silsden - to allow large scale development particularly on higher ground to the North and East before similar preventive measures are designed, financed and built presents an significant additional risk to existing residents.

Leeds have only this week announced considerable funding to alleviate flooding at Kirkstall etc, however Bradford appears to have no funding and sits between the two aforementioned authorities.

**INFRASTRUCTURE** ; Significant constraint, reference the outcome for 2030 Page 87, currently there is only limited funding available to deliver. Road improvements, manage flood risk {note core strategy, LIP and SHLAA

written before the flooding in DEC 2015}

Sub Area Policy AD2; Investment priorities - to improve public transport, to enhance the ease of movement and improve access to jobs within the Airedale Corridor. Unfortunately this encourages commuting rather than providing work by attracting employers into the area, close to the proposed residential developments and although attractive bus use packages are offered many will still use the private motor car or van, particular those in the physical type occupations.

As mentioned above infrastructure needs is a major constraint particularly in Silsden, that has been addressed in other areas namely Bradford has a comprehensive road network, Bingley, Keighley, Steeton have relief roads/by passes in place in the AIRE Valley and Burley, Otley, Addingham and Draughton in the WHARFE Valley and a comprehensive system around the neighbouring town of Skipton in North Yorkshire. Areas to EAST OF Bradford are served by the M606 along with a greater range of employment opportunities.

**FACILITIES** - Education currently the primary school is at capacity at entry level oversubscribed, plans are in place to deliver a new primary school. Silsden, Steeton and Eastburn are significant in that they are all operating out of dated buildings at capacity. In comparison new facilities have been put in place in more sustainable areas of the district...

Sport and recreation, private facilities are available adjacent to Keighley Road, the MUGA on Elliott Street {scheduled to go into volunteer management due to budget cuts} and Silsden Park which needs considerable investment to provide modern changing facilities and accessibility for persons of impaired mobility.

Drainage on the pitches is also an issue that has prevented matches taking place recently.

The town hall and church {all three dioceses} are regularly used and there is clearly a need for an additional meeting place/ indoor sports facility during the Winter months.

**TRAFFIC AND TRANSPORT** - The Town council have repeatedly requested for a HGV traffic restriction {over 7.5 ton} on the A 6034} THROUGH Silsden centre, however CBMDC refuse. When quizzed at a recent town council meeting, a CBMDC Highways officer stated if this was imposed it would entail an 8mile detour for HGV, Using bypasses of Draughton and Skipton. Note HGV vehicles transporting waste from Golden Butts in Ilkley use the route of the A6034 travelling to the waste transfer

station in Keighley.

**Buses** Transdev recently changed their Keighley to Ilkley route to avoid Kirkgate in Silsden, reasoning given being A }delays B }collisions with both parked and moving vehicles.

Ambulances, the A6034 is the shortest route for patients between Ilkley and Addingham to access the emergency AE facilities at Airedale General Hospital, town centre congestion especially at peak times presents a possible delay in receiving treatment in an emergency.

If relief road was provided this would resolve the traffic problems, at a recent meeting with local residents Transdev indicating they would re consider using Kirkgate and the recently completed new bus stop shelter } if a by pass was put in place { note the new revised route nearest stop has no shelter for waiting passengers }

**Rail**, Silsden has no rail station and access is via Keighley Road, however despite Developers citing it is easily accessible it is not, on the Western side the footpath is non existent at the Eastern side narrows at one point to less than eighteen inches in width. Recently an additional crossing point and island have been installed and existing crossing point near Belton Road, this is merely a sticking plaster approach and poses an additional risk for pedestrians.

Steeton station is the most difficult of all the station on the Airedale line to access for persons of impaired mobility and pushchairs/prams etcA

A key infrastructure requirement is a pedestrian cycle bridge over the A A629 linked in with footpath improvements on the Eastern side of the A6034, with ramp access as previously mentioned.

**Pollution** CBMDC did considerable work on pollution and its effects in 2011, finding that a significant pollution problem from vehicle exhaust emissions was present in the Aire Valley, tests were carried out also traffic counts on the A650, A MONITORING STATION is positioned at Rooley Lane near the M606.

No published data can be found for any readings in Silsden or the A6034, the health service indicate an increase in childhood asthma directly linked to pollution.

**Heritage**, the key heritage assets of the Silsden conservation area, bridge and habitats on the Leeds/Liverpool Canal are at risk of erosion due to effects of vehicle pollution, caused by excessive commuting both by private motor cars and dated diesel powered buses.

**Landscape** the updated HRA indicates allowing development closer to the SPM special protection areas of Rombalds Moor, providing mitigating green space etc can be provided elsewhere, to date only one developer has included a substantial area of their site to address this in addition to contributions to Sport/Recreation. Applying a similar proportion of green space to all sites in the the Shlaa, would be an option including sustainable drainage techniques. However this would result in not achieving the target of 30 dwellings per hectare.

## **APPENDIX; FLOODING**

PHOTO OF FLOODING BOXING DAY 2015 ALSO SHOWS LIMITED KERB EDGE FOOTWAY ON THE RIVER AIRE BRIDGE, RESTRICTING ACCESS TO THE RAIL STATION AT STEETON. THE FLOODING IS THE RIVER AND OVER THE RAISED GRASS SECTION FLOODING FROM SILSDEN BECK.

PHOTO OTHER SIDE OF BRIDGE SHOWING WATERS FROM FURTHER UP THE VALLEY AT KILDWICK AND SKIPTON, WHICH THEN MERGED WITH THE TRIBUTORY OF SILSDEN BECK WHICH SUBSEQUENTLY CAUSED MAJOR FLOODING FURTHER DOWN THE VALLEY AT STOCKBRIDGE IN KEIGHLEY