

## **Bradford Local Plan - Main Modifications Matters, Issues and Questions Response**

### **Councillor Jack Rickard MBE**

**This submission addresses Matters 2 and 3. None of the changes involving increasing housing are based on robust evidence, they cannot be justified. They ignore environmental constraints such as flood risk.**

**Summary: further to comments submitted on the Local Plan, the Main Modifications fail to account for the serious risk of flooding across the proposed development areas in Wharfedale. On the one hand this will put developments into flood areas, and on the other, it means that statutory consultations, must be in doubt because consultees have been incorrectly informed. Additionally, in its re-allocation of development under the MMs, it has failed to demonstrate the exceptional circumstances required for greenbelt deletions. The MMs fail to provide any further justification for the additional increases in development across Wharfedale.**

The March 2016 report by the Local Plans Expert Group confirms that Bradford Council has substantially overestimated housing need in excess of 500 homes per annum. This is additional to speculations about job creation, assumptions about international migration.

This matter must be viewed with the fact that the Council has not appropriately applied a sequential approach to decisions regarding the allocation, and re-allocation under the Main Modifications, of development. It has, therefore, moved from Stage 1 to Stage 2 unnecessarily.

Then, and crucially, with the housing numbers inflated, it has artificially constructed a spurious 'need' to allocate housing to Flood Risk Zones (including category 3 zones) ahead of low risk areas by basing its decisions on an incomplete, inaccurate and partial Strategic Flood Risk Assessment. The Strategic Flood Risk Assessment Level 1 produced by jba Consulting (initially published in 2011 and amended February 2014) is inaccurate and partial. It provides insufficient detail to fulfil the basic requirements of an SFRA and it is inconsistent with/omits to mention data regarding risks in Wharfedale identified by the Environment Agency. Anyone reading it would be forgiven for assuming that Ilkley and other parts of the valley are at low risk. They are not. The entire document is inadequate as a basis for applying the sequential and exceptions tests even at the preliminary level associated with the production of a Local Plan in which the potential capacity of settlements to take development and the general sustainability of SHLAA sites is being assessed. In addition, the SFRA is an inadequate base from which to develop a Strategic Flood Risk Management Strategy/Plan. Bradford also appears to have fallen significantly behind neighbouring Local Authorities with respect to meeting its responsibilities under the Flood and Water Management Act 2010 and has not been timely in delivering documents to partners involved in managing flood risks in the Ouse and Aire catchments. On the other hand, Environment Agency Flood Maps provide clear information that shows Wharfedale and Ilkley stand out as particularly prone to fluvial, pluvial and groundwater flooding by comparison with all other parts of Bradford bar points alongside the Aire.

In short, by allocating additional housing to Wharfedale and to Silsden the Council has increased numbers in areas where flooding occurs frequently and where development is likely to have an impact on watercourses that flood communities downstream.

In its duty to cooperate, the Council has presented other Local Authorities and consultee stakeholders (including EA and YW) with proposals that imply a greater 'need' for development that is likely to have a negative impact on their communities (and budgets), when there is no such need.

Most worryingly, by presenting statutory consultees with an SFRA, which misrepresents risks, it has misled them further. This is likely to have encouraged partners to accept a set of propositions that they might otherwise have rejected. These include propositions in the Main Modifications that put additional development upstream along the Wharfe and in the Aire catchment where they will pose a threat, not only to communities and businesses, but also to key transport and other infrastructure such as the main trunk road that runs alongside the Wharfe.

While appreciating the following is anecdotal evidence, a cursory search of YouTube videos from the flooding in Ilkley in December 2015 will show, first hand, the risks to building along the Wharfe. Swathes of land, important in soaking up flood water and ground water, between Ilkley and Burley-in-Wharfedale, are sometimes feet deep in water. The A65 became shut and effectively Ilkley residents were *locked in* to Ilkley. None of this has been taken into account by the planning team.