

## **Bradford Local Plan**

### **Core Strategy Examination**

#### **Further Statement Relating to Silsden For :**

**Matter 1 – S Pennine Moors (Policy SC8)**

**Matter 2 – Revised Settlement Hierarchy (Policy SC4)**

**Matter 3 – Revised Spatial Distribution of Development  
(Policies HO3 & AD1)**

#### **In Response to The Following Submissions:**

(PS/J019)	Cllr Adrian Naylor
(PS/J022)	John Pickles
(PS/J024)	Silsden Town Council

**May 2016**

## **1. Introduction**

- 1.1. This statement sets out the Council response to Examination hearing statements to the MIQs issued by the Inspector and made by various parties relating to Silsden and is designed to assist the Inspector in considering the soundness of the Core Strategy and the questions posed within matters 1, 2 and 3.
- 1.2. The Council has already submitted position statements for each matter and has responded in full to the representations made at main modifications stage within its Statement of Consultation. The Council's further statements therefore merely make supplementary points particularly in relation to new matters raised by participants or points of clarification.
- 1.3. The Council have not sought in these further statements to address matters which were not the subject of main modifications and which the Inspector has made clear will not be subject to further discussion within the hearings.

## **2. Response to PS/J024 (Silsden Town Council)**

- 2.1. Many of the Town Council's comments repeat issues and representations already addressed and debated at earlier stages of the Examination. In particular the Council has already explained the process and evidence underpinning the housing distribution and explained Silsden's status as a Local Growth Centre. The Council has also addressed the issues relating to infrastructure, and the reasons for the changes to the housing apportionment. There are no infrastructure related issues in the Council's view which suggest that the proposed increased housing quantum cannot be accommodated and no infrastructure issues which cannot be addressed by utility providers or be considered at Allocations Plan stage or as part of planning applications.
- 2.2. In the second paragraph the Town Council states that 'additional housing will require green belt deletion'. It is assumed this is referring to additional housing in Silsden. On that basis the statement is incorrect. SHLAA 3 data indicates a total land supply of 1,963 units on sites classified as 'suitable now' all of which lie outside the green belt. No green belt land is required to meet either the housing apportionment in the Core Strategy Publication Draft or in the slightly higher apportionment of 1,200 units resulting from main modification MM88.
- 2.3. If however the Town Council's suggestion that the housing apportionment to Bradford, which is currently proposed to be 27,750 units, is increased to allow for a decrease within Silsden, currently proposed to be 1,200 units, then that would indeed result in a need for more green belt release as there is a large gap between deliverable and developable supply in Bradford on non green belt sites and the current apportionment to the Regional City.

- 2.4. In the second paragraph, it is stated 'the majority of land allocation in Silsden according to the SHLAA is in the flood risk areas. This is also incorrect and the exact opposite is true. The sites within the third SHLAA which are considered deliverable and developable have a total capacity of 2,251 units. Of these 2047 units lies on land within flood risk zone 1 which is the Environment Agency defined lowest flood risk area.
- 2.5. At the bottom of page 1 of the submission, reference is made to Yorkshire Water. The Council can confirm that Yorkshire Water have raised no objections to the Plan, its proposed housing distribution or to the main modifications.
- 2.6. On the second page of the Town Council's submission under Biii it states that the majority of 'land allocated in the Silsden area is either Green Belt land or protected land with very little brown field sites'. It is not entirely clear what is being referred to but again the Council can confirm that the proposed Silsden housing apportionment would not require the release of current green belt land. It is correct however to say that there is relatively little deliverable brown field land within Silsden. However this in itself is not a reason to reduce the Silsden apportionment as there are substantial areas and options for development in sustainable locations some of which were tested and found to be suitable for development within the Replacement Unitary Development Plan (this includes a large area of safeguarded land to the east of the settlement).

### **3. Response to PS/J022 (John Pickles)**

- 3.1. A number of the comments relate to issues already covered by previous statements. In particular none of the issues relating to infrastructure are ones which justify a change to the proposed level of new housing within the settlement or are issues which could not be addressed in the future. Many of the issues raised are quite detailed in nature and could provide a useful input into the joint Neighbourhood Plan which is currently being produced by the respective Silsden and Steeton with Eastburn Town and Parish Councils.
- 3.2. The Council has explained in its main modifications statement of consultation that it has prepared a robust Strategic Flood Risk Assessment in conjunction with the Environment Agency and this has informed in an appropriate way the policies and development distribution within the Core Strategy. Further detailed points relating to flood risk issues have been included within a separate further Council statement.

### **4. Response to PS/J019 (Cllr Adrian Naylor)**

- 4.1. With regard to matter 1 the Council clearly disagrees with Councillor Naylor's comments relating to the HRA. Neither the revision to the HRA nor the housing distribution has been arbitrary and both have been fully explained in other documents including the main modifications themselves and the statement of consultation.
- 4.2. With regards to the comments made under matter 3 there are, in the Council's view, no physical constraints which would prevent the delivery of the required housing growth and the Council's Infrastructure Plan sets out the investments which may be

needed to support that growth. There is an adequate and deliverable land supply, tested via the SHLAA which will allow the housing to be delivered. The matters relating to transport investment and the Eastern relief road are matters to be addressed within the Allocations DPD.