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████████████████████
6 January 2016

Dear ██████████

Re: Core Strategy Proposed Main Modifications

Thank you for providing us with the opportunity to comment on the proposed main modifications to the Core Strategy. We have reviewed the modifications document and have the following comments:

Modification MM14, page 8

The proposed change to item B.3 in Policy SC5 Location of Development is acceptable. Highways England supports the policies set out in Section B of Policy SC5. However, one item of clarification is needed. Item B.2 refers to the 'Strategic Road Network' and appears to refer to both the local primary road network managed by Bradford Council and the strategic road network (SRN) managed by Highways England on behalf of the Department of Transport. Elsewhere in the Draft Core Strategy differentiation is made between the strategic road network and the local primary road network. A better wording would be 'strategic and local primary road networks'.

Modification MM38, page 29

The proposed modification includes a reduction of 900 in the number of new dwellings and replacement of 'approximately 100 hectares of new employment land' by 'at least 100 hectares of new employment land' in the regional city of Bradford (including Shipley and Lower Baildon). The provision of 27,750 new homes will still have a major impact on traffic volumes on the strategic road network (SRN) connecting Bradford with other major centres. The reduction of 900 homes will make little material difference.

The proposed change of wording in Policy from 'approximately' to 'at least' is a significant change of meaning and gives freedom for development well in excess of 100 hectares of employment land. A more precise definition would be preferred. The impact of employment development will depend on the mix of employment uses and the scale and distribution of employment development sites. This is a matter that Highways England will have to consider when the Draft Site Allocations DPD is brought forward and in comments on the two Area Action Plans.

Modification MM63, page 43

The proposed addition to paragraph 5.1.4 includes reference to Bradford city centre, the M606 corridor and the North East Bradford / South East Bradford / Leeds interface as 'areas for future economic growth'. These are the areas where the impact of development is likely to have the greatest impact on traffic levels on the strategic road network (SRN).

Recent traffic modelling by Highways England for our West Yorkshire Infrastructure Study (WYIS) indicates that schemes in the government's Road Investment Strategy (RIS) will not provide sufficient additional capacity to cater for the combined traffic impact on the SRN of Local Plan development in Bradford and the other districts of West Yorkshire in the period ending 2030. Capacity improvement measures additional to the schemes included in the RIS will be needed to cater for demand generated by planned development.

Additional schemes identified in the WYIS that are relevant to Bradford will need to be added to the schedule in the Local Infrastructure Plan (LIP). Further modelling work will be needed to determine the traffic thresholds or triggers for the additional improvement schemes.

In general, the committed RIS schemes where construction is to be commenced in the period 2015/16-2019/20 should provide sufficient capacity on the SRN in and around Bradford to accommodate traffic generated by Local Plan development in West Yorkshire up to 2022. Between 2020 and the end of the Local Plan period there will be a need to implement additional capacity enhancement schemes identified in the WYIS.

Where site development has a severe impact on the SRN, measures will be required to reduce and mitigate that impact. Any site that has a severe individual impact will need to demonstrate that any committed RIS schemes are sufficient to deal with the additional demand generated by the site. Where committed schemes will not provide sufficient capacity or where Highways England does not have committed investment, sites may need to deliver or contribute to additional schemes identified by the Highways England WYIS and included in the LIP.

This approach will be reflected in our comments on sites proposed for development in the Site Allocations DPD and in our responses to the consultations on the two Area Action Plans.

Modifications MM65 and MM66, page 43

The adoption of a more precise target for the annual delivery of new jobs is welcomed by Highways England. An annual addition of 1,600 new jobs is still significant and will have a substantial impact on trip generation and attraction. It is not clear whether the reduction in the jobs target will have any transport implications including for example, increased out-commuting from Bradford District that might need to be addressed by adjustments to other policies and proposals.

Please do get in touch should you have any queries relating to our response.

Yours sincerely



 Rios
Asset Manager

