

SILSDEN TOWN COUNCIL



Response to the proposed major modifications to the core strategy

Silsden sees in the modification the increase in housing number from 1000 to 1200

All our previous comments stand but in addition the following points are raised. The impact of the increased 200 houses has not been taken into account in the data, no justification has been given as to why certain areas have had their housing allocations increased. Whilst there has been a 20% increase in the proposed housing allocation, there has been no revisions made to the local infrastructure plan regarding the specific needs of Silsden. The LIP identifies utilities and transport as issues that could pose significant challenges to delivering housing. The LIP also identifies Flood risk, Drainage and Education as areas where work is required to ensure no significant risk is imposed section 5.4.1 pg 71

Utilities section 5.4.3.1 identifies a constraint regarding northern power grids primary substation at Silsden. Properties built in the region of 100 dwellings will require improvement to the 11KV secondary substations; properties in the region of the suggested 1200 will require major upgrade to the 33KV primary substation – we are aware that already there are some 300+ dwellings within application. We are also aware this substation covers areas outside Silsden which also need to be included in the figures and at the moment they are talking of a time scale between 10-15 years before upgrading.

Section 5.4.3.3 confirms that Yorkshire Water cannot accept any new foul or surface water flows to the Aire valley trunk sewer from all the areas it serves. Any increase in flows will create an unacceptable risk in pollution also identified by the EA.

Education 5.4.6 identifies the equivalent of 1110 primary places and 952 secondary places in the Aire valley and there is no planning to address the up and coming shortfall in secondary school places.

Flooding 5.4.7 whilst the LIP says that there technically no funding gap for flood risk and drainage infrastructure this is because there has been no costings or strategies approved [through the allocations DPD and area action plans] therefore appears as zero cost. The flooding of Dec 2015 highlights a need for strategic approach prior to any increase to housing stock.

The baseline assessment data information appear to be from 2009 and before and therefore out of date for current needs and projected housing needs over the next 15 years.

Conclusion statement

Any increase in housing numbers in Silsden appears to have no justifications identified as to why the town can accommodate a further 200 houses, in fact the LIP identifies that there is major strategic rationale for it not to happen.

A REMINDER OF THE PREVIOUS STILL PERTINENT COMMENTS:

Response to the Bradford MDC Core Strategy Development Further Engagement Draft

Having reviewed the strategy documents and supporting appendices it is clear that there are severe constraints on the infrastructure which is currently relied upon by the town on Silsden and neighbouring villages of Steeton Eastburn and Addingham. Whilst there is considerable documentation concerning potential development sites we feel that there has not been a similar amount of thought given to infrastructure requirements of these communities, especially when viewed from the point of view of an accumulative impact. This is most apparent when looking at the current and future education needs of the community; also the need for integrated transport plan to cover social, domestic, business and education needs. Could you please inform the council when we will be able to see the detailed plans relating to the above and in particular those in connection with the proposed plans for the upgrading of the Airevalley trunk sewer.

There also appears to be a major omission regarding the provision of public amenities such as open spaces and support for the existing services to meet with the proposed increase in demand that will come from 1200 more houses. When are we likely to see plans which will accommodate retail and service based activities given the restrictions currently present on Kirkgate for any future retail development.

Silsden Town comments as follows:

1.0 Overall Context

- a) We question the basis for the overall figure of housing requirement of 45,500. This figure comes from the earlier Regional Spatial Strategy and pre-dates the current severe economic downturn. Low economic growth, reduced bank lending and mortgage availability are predicted to last for at least half the 15 year LDF plan period. This will affect the demand for and delivery of 45,500 homes within the plan period.

- b) The evidence presented in both the Strategic Housing Needs Assessment and the Affordable Housing Study (AHEVA) that underpin the Draft shows that there is little to justify the release of land in Silsden. The SHMA presents scant evidence of substantial housing need in the area. It also shows that building large numbers of homes in the town would not address the need for affordable housing in the District. It would deliver housing at the wrong price in the wrong place.
- c) There are also risks associated with opening up substantial development sites within the green belt. These include risks to the wider property market across Bradford and risks to the economic wellbeing of Leeds, Bradford and the Leeds City Region.
- d) There is evidence within the SHMA that indicates that the impetus to develop green field sites in Silsden is coming from property developers who are seeking to manage their risk and maximise their profits by pushing development in the green belt rather than prioritising brown field sites in urban settings.
- e) Areas of central Bradford are identified as having the greatest need for new housing whereas Silsden has a specific but limited local need. The DOE states that “Sustainable development makes it possible for people to live close to their work and within communities that can provide for their needs locally”. Therefore for the LDF to be sustainable, houses required for Bradford should be provided within the city or its environs rather than over provision at the geographic extreme of the district.
- f) We believe that the future houses required for Silsden should in the main serve the local needs of the town (i.e. be sustainable) and this will be further developed in the “Neighbourhood Plan”.
- g) We are unclear as to whether the housing proposals fully utilise all the available brownfield land and cleared sites in Bradford (e.g. the “Pathfinder Programme - refurbishment of existing properties should be the first option in order to provide ‘affordable houses’). It would appear the figures do not take full account of the empty housing stock.

2.0 Airedale (Policy AD1)

- a) The town of Silsden has a higher than district average of journeys to work by car – the majority of residents within the working population travel to Leeds or Bradford and further afield. There is also a significant proportion of the population within these areas who are retired. Construction of new houses would have little effect on Bradford’s housing needs.
- b) Settlements within the entire valley are linear in nature with severe restrictions on both road and rail transport links. The railway station at Silsden and Steeton has inadequate car parking facilities and does not have an integrated public transport service as no coordination between rail and bus times thus increasing car usage. The road system is congested, particularly at bottlenecks such as roundabout with Steeton (A629) and the main route through the town connecting the Airevalley to the Wharfevalley .

- c) The landscape and character of the Aire valley are of special importance, the valley becoming increasingly rural beyond Keighley and where development would significantly damage their natural beauty and potentially adversely affect the existing function of the valley as a flood plain.

3.0 The Town of Silsden

- a) The character of the town has changed from a small, semi-industrial settlement, with several mills providing local employment, and a railway connection, to a more distinct rural residential community, with limited local employment and a restricted road network.
- b) The town origins are based on a classic linear settlement which has expanded much in the last 30 years, the centre of the town is in a conservation area. It has significant open hillsides to each side, which are important green belt areas defining the setting and allowing noteworthy views out of the conservation area. The River Aire, the riverside and the canal also have great landscape value - note the LDF document's stated aim, "to conserve and enhance the heritage values of settlements within the AireValley".

4.0 The LDF proposals for Silsden

- a) It is proposed in the draft document that Silsden, as a "Local Growth Centre", Any level of development would require investment in infrastructure prior to building such as an Eastern Bypass; Schools and Sewerage etc.
- b) The residents have been consulted via Silsden.net website which will be supplemented by the Silsden survey an update of the adopted Silsden Design Statement. A well attended public meeting has also been held. The consensus was an acceptance that some additional housing will be required but that this should be limited in number and that the homes should be mainly low-cost and affordable, to serve local needs. But prior to any significant levels of housing the severe deficiencies in infrastructure such as Education, relief of congestion on the existing road network through the town and the sewerage network which is at capacity at present.
- c) A detailed needs survey is currently being carried out in Silsden to establish housing demand and the types of dwelling required.
- d) We consider that there are some locations in Silsden which could be suitable for development without detriment to the character, setting and important green belt perimeter of the town or the defined existing green spaces within the village.
- e) A major concern expressed in feedback from public consultation is that before any further significant housing development takes place, the problems of education, transport, healthcare, flooding and sewerage be addressed and resolved. This is a specific problem for Silsden but also applies to the whole of Airedale and part of Wharfedale.

5.0 Transport and Parking

- a) It is noted that the key overall plan diagram indicates a “quality bus corridor” between Ilkley and Steeton together with an eastern bypass for Silsden. Which is only likely to provide minimal improved potential to access rail stations in Ilkley and Steeton. The commuting distance and time to places of work would still be excessive.
- b) There is likely to be a significant increase in traffic onto the A629 and A65, particularly at peak times, with further traffic congestion through Silsden, Keighley and Ilkley causing a detrimental effect on the town.
- c) i) Parking within the town of Silsden is currently a problem, with limited parking areas and a constricted Main Street where on-street parking is the norm, in order to sustain town shops and businesses and as an adhoc method of slowing traffic.
ii) Parking at Silsden and Steeton railway station – particularly long-term – is an increasing problem and will be further aggravated by an increase in commuter traffic parking to access rail links to places of work, especially Leeds and Bradford.

6.0 Education

Insufficient places for secondary school children are an ongoing problem for Airedale and Wharfedale. Ilkley Grammar School is at capacity and rebuilding under the “Schools for the Future” programme has been abandoned. Any spare capacity at the University Academy Keighley will be taken up by the proposed 5000 house increase to Keighley. The capacity to accommodate children from Silsden has been the cause of much debate during recent years and will require a solution involving North Yorkshire as well as Bradford for secondary education. At present we do not see any evidence of future planning for education within Silsden. Expansion of Ilkley Grammar School and / or a new school in Wharfedale (e.g. in Burley?) should be resolved before any significant housing increase.

7.0 Healthcare

- a) The capacity of Airedale Hospital and the potential for its expansion should be considered before the construction of the considerable number of additional dwellings proposed for both Airedale and Wharfedale. The issues of access by public transport as identified within the core strategy and the need for adequate parking facilities need to be addressed prior to any building.

8.0 Greenbelt and Setting

- a) The nature and character of Silsden, particularly the conservation area and its green belt setting, should be preserved and enhanced – as assessed by the City of Bradford conservation team. Any new building should be sympathetic to the scale and character of the settlement.
- b) The location, near the Yorkshire Dales National Park and adjoining the Nidderdale Area of Outstanding Natural Beauty and the Dales Way, is of special importance. The potential for increased local involvement and facilities related to

visitors and tourism is to be explored within the proposed Neighbourhood Plan document.

9.0 Drainage

- a) Surface drainage - Silsden has a number of sensitive water courses flowing through it. There is concern that the proposed 56% increase in housing stock and the associated run-off will increase the flood risk both in the town and to properties located on the identified flood plain as well as the potential to push the problem further down the Aire valley.
- b) Foul drainage – large scale development in Silsden on rising ground in the 1980's significantly increased the volume of foul sewage. As a result the sewers and treatment are now at capacity. Major improvements in capacity would be required prior to any significant additional developments.

10.0 Employment /Tourism

Silsden has some local employment but without integrating the expansion of employment opportunities and the resulting skill requirement it is likely that any significant housing development will necessitate increased commuting, which is not sustainable. The Yorkshire Dales have experienced a significant growth in tourism over the last few years as a result of very effective national advertising campaigns. Silsden has benefited from this and the increasing number of visitors generates important trade for the local shops and pubs. It is therefore crucial that any new development does not detract from the character and ambience of the town.

11.0 Ecology & Agriculture

- a) Ecology – loss of greenfield land and disturbance of “green corridors” is likely to have a detrimental impact on fauna and flora. This will be considered in the Neighbourhood Plan.
- b) Agriculture – increased political instability around the world has emphasised the importance of long term security of the national supply of energy and food. The permanent loss of productive agricultural land to housing development is therefore an important issue. A significant proportion of the existing population live in or are employed within the farming community. The LDF proposals should reflect this sensitive issue.

12.0 Conclusion

- a) It is accepted that there is a potential need for some limited expansion of housing but that this should relate to local need – following local consultation.
- b) Any new housing must be sustainable and carefully sited to avoid damaging the character and setting of the town and the wider surrounding area. Valuable productive agricultural land must be conserved.
- c) Any new housing will have little effect on the pressure within Bradford for additional housing because of the remote nature of Silsden.

- d) There should be no new housing until infrastructure problems; in particular transport, education and drainage have been addressed. Housing must be sustainable in these terms and should reduce the need to travel considerable distances to places of work.

- e) New housing, business and tourism and local facilities should all be addressed by means of a Neighbourhood Plan as set out in the Localism Act. This should involve local consultations and reflect how residents wish to see the town develop.