## Q and A Responses - Session 20: Airedale - 12<sup>th</sup> March 2021

Session Questions / Matters Raised	Response
How is the level of growth for each settlement decided? Is there a calculation or another method?	Policy SP8 sets out the overall approach / methodology - also worth a review of the technical note in relation to SP8 on the council's evidence base webpage.  Housing Growth - Policy SP8 - Technical Note (bradford.gov.uk)
	<ul> <li>Spatial distribution is informed by ensuring: <ul> <li>Housing growth is where possible concentrated on areas where the need is greatest.</li> <li>The need for new homes is met in a sustainable way which supports the district's economy and reflects planned changes in infrastructure.</li> <li>The distribution proposed maximises the benefits of development (for example making good use of brownfield land and securing investment and improvement in key regeneration areas).</li> <li>Minimises environmental impacts - for example directing development towards areas of lowest flood risk and avoiding significant impacts on areas designated for the value e.g. wildlife habitats, open space</li> <li>The proposed housing distribution is deliverable and reflects the realities and constraints of land supply.</li> </ul> </li> <li>The population baseline is the general starting point, but then evaluated against a range of variables as set out above.</li> </ul>
Question whether the industrial land availability is sufficient to accommodate growth	The economic forecast work indicates a need for about 72ha of employment land to be delivered within the plan period. This work is based upon the use of the Regional Economic Model and sense checked against employment land delivery rates. As with many macro-economic concerns at present there is a considerable degree of uncertainty moving forward and the employment land need analysis includes a 50% buffer in consideration of some of these variables.
Please summarise the discussion about the incinerator that took place yesterday - I wasn't able to attend	The proposed incinerator site is included as a commitment within Policy EN19 (Waste Management Allocations) and has planning approval which will have considered potential environmental impacts. The policies set out in the plan work on the basis that environmental impacts have been effectively considered through the application process and in determining the application with any relevant conditions attached.
You mentioned green infrastructure improvements, e.g. along the canal. Are you talking	The transport policy team which have worked closely on the plan development has strong connections with key transport bodies. Projects and priorities are also captured with the council's developing Local Infrastructure Plan (LIP). Any additional content / connections welcomed.

to CityConnect or Sustrans? Good point. I'll talk to Bradford Cycling Campaign and Sustrans.	
How do sites end up on the plan? Do they have to be nominated? I'm referring to housing sites	Sites are generally submitted to the Council by landowners and agents over a number of years sometimes through 'Call for Sites' exercises and are also identified through other sources – site visits and urban capacity studies. In some cases, sites are also declared surplus to requirements in terms of the Council's estate and these are also included within the 'long list' of sites at the start of the evaluation. The overall database of sites is captured through the Strategic Land Assessment (SLA).
Where do we find the detailed assessments of sites rejected?	The main published information on rejected sites is to be found here:  Site Assessment and Rejected Sites Background Paper (bradford.gov.uk)  Strategic Land Assessment (SLA) - January 2021 (bradford.gov.uk)  Further detailed site evaluation information will be published as the Council finalises proposed housing and employment sites as part of developing the Regulation 19 document. This will include a reflection on material submitted at this stage in the plan development.
Can further info be provided on the Steeton green belt site please near rail station.	This was further detailed in the session in light of the site pro forma.
Should not the Transport Strategy be developed alongside this Local Plan? In Keighley South East the half hourly bus service is mentioned, This has been cut to one per hour over a year ago.	Yes – the Local Plan generally provides a strategic land use view and the transport strategy will be focusing upon more detail, delivery and potentially non-land use issues.
On what grounds were greenbelt sites in Silsden rejected?	See links and documents detailed above. The evidence base also includes an assessment of Green Belt parcels and the impact of development on the Green Belt.  Green Belt 1.0 Overview Paper (bradford.gov.uk)
Sites in Long Lee and Thwaites Brow mention easy access to health facilities. I assume they are	Thank you for the update on local infrastructure. This will be picked-up in the next iteration of the plan and Local Infrastructure Plan (LIP) detail.

referring to Long Lee GP surgery. GP consultations and even treatments by health assistants have not been held there for approx. 15 months. It is currently a Vaccine Centre.	
Silsden Belton Road protection of industrial area and flood risk, namely allowing land for flood storage. For example a winter reservoir obviously this is subject to consultation with environment agency	Thank you for the information – this will be picked-up in further discussions with the Environment Agency.
Sites in Long Lee mention positive impacts on the local economy. The local economy consists of a convenience store, a pub and a pharmacy. The only employment is agricultural, By using a number of greenfield sites this will have a negative impact on that.	New housing will bring new residents which will hopefully have a positive role in supporting local businesses and services. Where currently agricultural sites are submitted to the Council it is assumed that these are surplus to requirements, where there is an agricultural business which still intends to trade. The Council considers the soil grading of agricultural land as part of the site assessment process.
In Steeton the employment site is next to Lyon Lane but this is a very small ancient farm road. How will that work especially as more traffic may come from Green Lane.	The proposed employment site is considered has having a close relationship with the nearby business use.
Access to Long Lee and Thwaites Brow is not good. To access Keighley, it requires using over Coney Bridge. To access Bradford	The Council is aware of the issues with Coney Lane bridge and Park Lane. As part of the evidence base supporting the Local Plan, the Council will be undertaking further work on a transport model to assess the impacts of the proposed sites in Long Lee (as well as those identified across the district as a whole) on the highway network. This will allow us to then examine potential opportunities to address them through new and/or enhanced infrastructure. The

much traffic goes down the Twines, an ancient cobbled road, which is not suitable in order to access the A629.	modelling will also feed into the process of making decisions on the final set out sites and the phasing of development, should they be allocated in the adopted plan. Furthermore, the site pro-formas highlight this issue as being one of the planning considerations that should be considered as part of preparing development proposals and determining planning applications. Within the final draft of the plan, it may be possible this is included as policy requirement to be addressed, should they be allocated.
	The modelling work will also feed into the Local Infrastructure Plan (LIP), being preparing to support the Local Plan. Ensuring that infrastructure requirements within the LIP will allow developers to where they would be expected to contribute towards infrastructure, provided that it meets the legal tests for seeking contributions. Inclusion in the LIP and the Local Plan, can also provide a basis for the Council to seek funding from other sources to deliver infrastructure to support development e.g. from sub-regional or national funding.
	The current stage of the Local Plan is still classed as being an options stage, and, as such, may be subject to change in its next edition. The context of the next version (known as the publication or submission draft Local Plan) will be based on the updated evidence/assessments on a range of topics, the public consultation received as part of the Preferred Options stage and any other changes to the wider planning policy context
There is no mention of support for local agriculture and its potential for flood storage, biodiversity. Also lower level prime agricultural is needed in winter months. Hopeful the importance of this will be identified in the environment bill.	Useful points. Some discussion within new countryside policy (EN6) but not in detail - much in the plan in relation to bio-diversity (EN2) and flood risk and management of (EN8) and Green Infrastructure (EN1).
Baildon, why state that some green areas you mentioned, are any more valuable to preserve than, say, Meadowside?	The Council welcomes representations on the preferred allocation sites and also other aspects of the plan including supporting evidence – which includes an extensive assessment of open space and review of green belt function and impact of development. This information is available here: <a href="https://www.bradford.gov.uk/Documents/BDLP/Evidence//Open%20Space%20Audit%20Report%202021.pdf">https://www.bradford.gov.uk/Documents/BDLP/Evidence//Open%20Space%20Audit%20Report%202021.pdf</a>
	https://www.bradford.gov.uk/Documents/BDLP/Evidence//Green%20Belt%201.0%20%20Overview%20Paper.pdf In developing the strategy for Baildon, it involves a degree of professional judgement in relation to identifying areas for growth and areas for protection. The selected areas for growth have been subject to detailed assessments and specific development consideration in relation to BA5/H are set out in the site pro forma including compensatory

	improvements to the surrounding Green Belt and a sensitive approach to design and layout reflective of typology of the site.
Question re Baildon - What is the % of affordable housing in the plan for Baildon and specifically the Meadowside (Tong Park) site? How does this compare to other areas?  What is considered to be green infrastructure?	Policy HO5 in the plan sets out affordable housing requirements. Baildon is classified within affordable housing Zone 2, which equates to 20% on brownfield sites and 25% on greenfield sites as a target. The zone 2 classification generally relates to towns, suburbs and villages within the District but excludes Wharfedale which has higher affordable housing targets.  Green and Blue Infrastructure (GI) is a network of multifunctional green and blue space and includes a number of environmental assets such as parks and greenspaces, playing fields, woodlands, street trees, hedgerows, allotments, private gardens, rivers and other water bodies, and at a wider landscape scale, areas of open countryside and green belt. Further information and a proposed strategic policy on green infrastructure (SP10) is set out in the plan.
Does the Baildon figure take into account housing sites that have already/recently been given planning permission?  Elected members have said there are 80-90 houses already which should have been taken off the 250.  Ongoing developments not included in the housing allocation for Bingley/Cottingley	Yes. Table 1 within the Baildon profile (section 5 of the plan) includes a carried forward commitment of 81 dwellings as at 31 <sup>st</sup> March 2020. This is discounted down by 10% in consideration of non-delivery / under-delivery in line with other settlements, which then sees a carried forward commitment of 73 dwellings.  Similarly, for Bingley and Cottingley, each of the settlement profiles includes details of the number of dwellings from existing commitments (sites with planning permission and/or under construction). For Bingley, Table 2 of the profile shows commitments totalling 163 dwellings (147 dwellings when discounted down by 10% in consideration of non-delivery/under delivery) that will be carried forward into the Local Plan. With regard to Cottingley, Table 1 of the profile shows commitments totalling 3 dwellings that will be carried forward into Local Plan.
Will Transport Strategy be subject to public consultation?	Yes – it is proposed to develop the transport strategy alongside the development of next stage of the Local Plan and consult on the strategy to broadly align with plan development timelines.
Please could you explain why Bradford Council wants to build these houses and where it's going to find the money from to do so. Or, is it the case that Bradford Council wants to make it possible	As a local planning authority the Council needs to put plans in place to meet housing needs. The sites proposed within the plan will generally be progressed by housing developers (wide range of types) to deliver housing to meet the identified housing requirement for the plan, which is 1,704 dwellings per annum.

for others to build on land designated as greenbelt?	
Why does this consultation have to take place now in a lockdown? This local plan has been years in the making. Why could consultation not wait until summer when there's the likelihood of libraries being open or the possibility of exhibitions of the plans and meetings to discuss them?	Government has placed a strong focus upon local planning authorities to progress with developing up to date local plans and have these in place before the end of 2023. Government has also changed the planning regulations to enable Councils to consult online and temporary removed the requirement to deposit hard copy material in deposit locations (including libraries). This plan is at an early stage of development and the process to finalising the plan can take a considerable period of time. Leaving consultation on the development of the plan until later in the year will introduce a delay to producing the plan and while Government has set out an exit strategy from lockdown, it is a cautious strategy and one which could be reviewed depending upon progress made fighting the pandemic. You will note some of the challenges in Europe currently in terms of managing additional waves of infection. The online nature of the consultation and extensive use of social media has potentially introduced a wider range of people to the plan consultation and the representation figures are healthy in terms of volume and coverage of areas.
How many people in Bradford district do not have access to the internet and so are not able to access the local plan?	The Local Plan team is unable to report on exact figures, but there is information within the Local Insight material which accompanies the plan on profiles of internet users and quality of broadband in areas. It is worth noting that information on the plan has been disseminated through Area Teams/Ward Officers to facilitate wider connections within communities and where requested paper material has also been supplied to people unable to access the internet or have difficulties using IT.
What efforts has Bradford Council made to develop identified brownfield sites? Since the register was created in 2017, how many brownfield sites – what acreage – have been developed for housing?	The Council has experience of supporting the delivery of housing in brownfield locations. Conditioning House in the City Centre is an example with funding support from the West Yorkshire Combined Authority (WYCA) to help deliver housing growth. The Council has also put forward a number of brownfield sites more recently for funding support to facilitate housing growth. Table 3.1 in the Council's recently published Strategic Land Assessment (SLA) sets out delivery figures for development on brownfield sites from 2013 to 2020, which equates to 4,000 units within the regional city, 812 units within the principal towns, 449 units within the Local Growth Centres and 600 units with Local Service Centres. The figures for 2017-2020 are currently pending and awaiting officer input.
CIL – what processes are in place to show transparently where funds raised through CIL are being spent?	The Council is required to produce an Infrastructure Funding Statement on a per annum basis and this can be found on the Council's website: <a href="https://www.bradford.gov.uk/media/6150/infrastructure-funding-statement-2019-20.pdf">https://www.bradford.gov.uk/media/6150/infrastructure-funding-statement-2019-20.pdf</a>
The choice of Green Belt sites in the Bingley/Cottingley area	The Green Belt sites selected for Bingley and Cottingley was discussed in the session and is also covered with the relevant section 5 of the Local Plan together with supporting site pro formas.

Effects of proposed developments on flood zones.	Based upon current flood risk information (fluvial and surface water), the Council has identified proposed housing sites to minimise flood risk. The approach to site selection including the approach to flood risk is set out in the Council's update to the site assessment methodology. The Council is also working with the Environment Agency on updating flood risk information (Strategic Flood Risk Assessment (SFRA) – Level 1) – there is also a technical note on this work programme also on the Council's website. Beyond the level 1 assessment if sites may be subject to some degree of flood risk (edge of site for example), further detailed work will be undertaken on understanding the flooding risk and any related issues (SFRA Level 2).  Links below to various sources: <a href="https://www.bradford.gov.uk/Documents/BDLP/Evidence//Site%20Assessment%20and%20Rejected%20Sites%20Background%20Paper.pdf">https://www.bradford.gov.uk/Documents/BDLP/Evidence//Flood%20Risk%20Technical%20Note%202021.pdf</a> <a href="https://www.bradford.gov.uk/Documents/BDLP/Evidence//Flood%20Risk%20Technical%20Note%202021.pdf">https://www.bradford.gov.uk/Documents/BDLP/Evidence//Flood%20Risk%20Technical%20Note%202021.pdf</a>
Effects of increased traffic, especially in the Cottingley/Cottingley Bar/Cottingley Cliffe and Cottingley Moor roads. Is there any data? If not are there plans to gather data?	The Council will be inputting sites within a new Strategic Transport Model (STM) to understand the impact of development on the highway network. This information and any subsequent work on mitigation measures will help inform the development of the next iteration of the Local Plan (Regulation19).
Effects of increased traffic on public health.	The plan sets out a series of progressive transport policies to ensure active travel and public transport are at the heart of plan-making. The extent of traffic increases will be better known through the work on the STM and the plan is also clear on the need in areas of current low air quality to put in place measures to improve air quality (clean air zone). Policy EN8 covers a range of air quality mitigation measures in more detail – including designing buildings (if necessary) to minimise exposure to air pollution.
Clean Air zones. Why this ends at Saltaire and does not include the whole of the Aire Valley?	The CAZ is modelled around the areas with the highest concentrations of air pollution for targeted action – see figure below for Nitrogen Dioxide average levels. You will see a relationship between the defined CAZ area (also see below) and air pollution map. Further information on the CAZ is available here:



