

# Bradford Local Plan Response

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Dear Sirs,

By way of an introduction to the following response, I have summarised my approach and important information at the head of the response, followed by answers to each question asked.

Throughout the response, I have used the following colour legend:

- Orange** - Quotation from Bradford's summary text.
- Blue** - Extract from the Local Plan documentation.
- Red** - Question numbers in the consultation.
- Green** - Quotes from elsewhere

## Local Plan Housing need.

There are two published documents regarding local plan housing need. These are:

1. Five Year Housing Land Statement dated January 2021
2. Housing need Addendum dated February 2021

There are contradictions contained within these documents and the Five-Year Housing Land Statement states:

*"Para 3.3 The Core Strategy was adopted in 2017 and it still less than 5 years old. Although it is the Council's view that the housing requirement figure, along with other strategic policies within the Core Strategy should be updated and amended this has yet to be confirmed and validated via the normal process of consultation, engagement, examination by the Planning Inspectorate and finally adoption. The Partial Review of the Core Strategy (CSPR) consulted on an annual housing need for a revised plan period (2020-2037) using the current standard method, but until the review process is more advanced little weight can be given to these revised policies. Therefore, at present it is concluded that the appropriate and NPPF compliant approach in calculating the 5-year land supply required, is to use the adopted Core Strategy figure which is 2476 homes per annum."*

It is therefore fair to state that the local plan consultation has yet to be examined by the MHCLG and requires adoption by Council of a new housing need figure. This document is out of date and does not inform the consultation process.

This then raises the question of forecasting housing numbers ahead of the 2021 census. Surely, Council would be better placed to forecast housing numbers post 2021 after publication of the census results. This could take place at any time, providing that it is completed ahead of December 2023.

The government's approach to the assessment of housing need has been revisited in 3 recent White Papers, a point which Council have clearly recognised. Given that the impact of the pandemic and Brexit are impossible to predict and are very likely to change the shape of the district and household projection (as I am already seeing in recent Council Communications), it add more weight and makes much more sense to defer the Local Plan consultation until after the March 2021 census.

Another historical consideration further supports deferral. Between the 2001 and 2011 census's, Bradford District saw a seismic shift in commute ratios amongst other things.

*"Jobs over the previous decade were once again predicted to grow at pace. However, commuting in / out of Bradford shows a net outflow of around 10% (5,300 commuters), which is a similar order of*

*difference, but reverses the pattern seen at the time of the 2001 Census, when broadly 45,000 commuted in and 40,000 commuted out (a net inflow)." Source Employment Needs Assessment 2019 Section 3.30.*

Do Council look back at historical change and factor them into plans and if so, what consideration has been given to this issue?

### **Local Plan Summary.**

Abraham Lincoln once said "You can fool all of the people some of time; you can fool some of the people all of the time, but you can't fool all the people all the time."

This is particularly true of the vision set out in the Local Plan, much of which dates back many years and has failed to show any significant progress on delivery of its aims. I am not sorry to say this, but unless the issue is raised, nothing is achieved.

### **Key performance indicators (KPI's).**

There's a lack of actions, key dates, milestones, any documented measures for success/failure and no KPI's. These are crucial for any credible plan, as I will show below.

### **The 2005 RUDP.**

Looking back to 2005's RUDP and perhaps earlier, I see that many of the policies contained in the Local Plan are those which were **introduced between 13 and 16 years ago**, perhaps earlier. The following are clearly stated:

- **Brownfield viability issues** affecting the delivery significant housing, where they are most needed, has been an ongoing issue for at least 16 years. The issue and vision are recorded in the **2005 RUDP**, points **6.18, 7.25** and **7.26**.
- 2007 saw the introduction of the Local Development Framework (LDF), the '**2020 Vision**,' as it became known. Contained in its pages at point **2.7** we have, "*The District will have a diversified high wage, high skill, knowledge-based economy with particular strengths in cutting edge hi-tech manufacturing and communications, financial and business services, cultural and creative industries, and environmental industries.*"

I would like to express my personal concern about the credibility of some policies which re-appear in the Local Plan.

My concern is well founded in that there is insufficient evidence available to support continuing with such policies. The underlying issues remain, there is no measurable evidence of progress, that is no improvement in brownfield viability, or delivery of a highly skilled workforce or knowledge-based economy. Quite the opposite is

true. Is the Council's expectation that things will change given more time?

**Fail to plan, plan to fail.**

What I am trying to understand is why Council still have the same '**vision**' for the district. There are identical policy statements which do not appear to deliver any positive result.

Council appears to assume, that something could change given enough time, however, nothing changes if nothing changes. If the Council's approach remains the same, then I must question whether any careful consideration has been given to the Local Plan's content.

If Council persist with this approach, then realistically, are Council up to the task at hand and are the public expected to tolerate another 17 years (33 years in total) of inaction?

## Local Plan Response.

### Question 1 Preferred Options.

The preferred plan period runs for 17 years (2020 – 2038) as opposed to the normal 15-year plan, extending forecast methods which are used to inform the plan by an additional 2 years.

I would therefore suggest that the Local Plan's progress is scheduled for review no later than 5 years after the plan period commences. I also believe that if Council forges ahead with the Local Plan based on existing the existing MHCLG 'unapproved' Five Year Housing Land Statement dated January 2021 and Housing need Addendum dated February 2021, that the plan will need to be extensively reviewed shortly following publication of the 2021 Census data.

### Question 2

#### Policy SP1: Delivering Sustainable Development.

##### A. The Presumption in Favour of Sustainable Development

Quite clearly there is a disconnect between housing and infrastructure delivery. That is, although transport infrastructure is at the planning stage, with no defined outcome, many transport policies will be at risk of failure because of the outbreak of COVID, including rail transport. In essence, the lack of a well-established and coherent transport policy would indicate that the Local Plan does not conform to the NPPF sustainability policy, as defined in Section 2, paragraphs 7 to 14 inclusive.

##### B. Supporting the Three Objectives of Sustainable Development

In respect of the policies referred to, several underlying issues need to be addressed.

From point 3, "*by focusing development in its main urban areas.*" and from 3.2.11 "*There is a clear thread running through the Local Plan of supporting the renewal and regeneration of our urban areas and brownfield sites.*" I agree this is an important issue; however, the Council should take a long hard look at whether progress is realistically being made or is likely to be made and consider how this policy can be delivered.

Here and elsewhere in the Local Plan, Bradford Council aspire to make unviable Brownfield land viable through the process of regeneration. This has been long been the case. In the **2005 RUDP** I see "*However, it is recognised that in some of the district's housing and commercial markets, financial constraints may make housing an economically unviable option for the foreseeable future.*"

The issue of 'viability' was revisited in a 2012 study involving developers, house builders and property consultants. It was again

raised in a questionnaire to the same participants in 2014, and the same 'viability' issue appears in the proposed Local Plan.

It is an established fact that the district's currently 'unviable' Brownfield land can supply a **significant housing contribution** if remedial action is taken on unviable land. In addition, from further examination of the plan, it is established that a further **5,000 homes** remain unoccupied. Most of the unoccupied housing is in 5 key areas of the district: these are City Centre, Bradford NE, NW, SE and SW.

These two alone would make a significant contribution to the district's 'perceived' housing need. To put this plainly, unoccupied housing could contribute 15.6% of the district's required housing target and 'unviable' land could potentially contribute another 15%+ over that number.

The awkward question I wish to raise is, why has this issue persisted for the past 16 years? Why, in this Local Plan, do I find - "3.1.6 *Securing new development, investment and regeneration will not only provide the jobs and prosperity which will support local people, but will help to drive up land values increase market confidence, and render previously marginal schemes viable.*" This is precisely the same policy approach adopted back in 2005 in the RUDP. What has this policy delivered historically and when are Council going to show real progress in achieving its goals?

Let me look at evidence that is used to support and inform the Local Plan, data which Bradford Council holds that would inform a change of approach.

1. Building more housing is driving down house prices in **real terms**. [Appendix 1 - House Prices]
2. The average percentage loss in house price is greater than the average fall in Yorkshire and the UK. (source - Local Insight Guides) The percentage change in all tenures is **-15.83%** compared to Yorkshire at **-11.00%** and England which stands at **8.10%**. [Appendix 1 - House Prices]
3. Looking at the figures there are two possible explanations:
  - a) Housing supply has exceeded demand.
  - b) Residents living in the district cannot afford to buy housing. This is one of the conclusions reached in the 2019 SHMA and its predecessor.

Whatever the reason, there has been a long-term failure in addressing an important ongoing issue affecting delivery of homes where they are most needed, close to jobs and in those areas most in need of affordable housing.

During the CSPR consultation, I suggested that Council should talk with the adjacent authority in Leeds and/or Manchester Council regarding regeneration, making brownfield land viable, etc. Leeds and Manchester had faced the same issues in the early 1990's and the 00's, respectively and yet had turned their housing viability issues

around. Equally, Council should be considering schemes like that in Nottingham who have faced the same issue - see <https://www.energiesprong.uk/projects/nottingham>.

From point 4. *"by developing healthy places with access to a network of green spaces which enhance the built environment, provide opportunities for sport and recreation and by taking action to tackle air quality problem"*

This policy aligns with Bradford's January 2019 declaration of a climate emergency. In the context of the Local Plan, considered as a whole, it is a very good policy statement.

However, it is another area where action needs to match aspirations. In 2020 Bradford Council submitted their support for expansion plans at Leeds Bradford Airport, without consideration of the effects of that decision on Wharfedale residents. Whilst Council had no legal obligation to consult with those communities affected, they should have understood the health, welfare, and air quality issues of that decision. This answer also applies to **Questions 46a & 46b, policy EN8: Air Quality**.

**Question:** Are Bradford Council aware of the following issues and what is their stance on these matters?

- **In 2018/19 80% (30,994 flights) of all departing air traffic movements (ATM's) at LBA were made from runway 32 (Burley in Wharfedale/Menston direction)**, whilst only 20% (7,748) of departing air traffic movements were made from runway 14 (Leeds City direction). This is a deliberate policy by Leeds Bradford Airport (LBA) and has nothing to do with wind direction (see later bullet point).
- Similarly, 77% of all night-time air traffic movements from May to October 2019 (2,142) were made from runway 32, whilst 23% of all night-time air traffic movements (641 flights) were made from runway 14. Again, this deliberately disadvantages residents in the Wharfe valley (Burley in Wharfedale/Menston).
- Irrespective of how many people live in the Burley in Wharfedale/Menston/Ilkley area and the Leeds City area, continuing to allow such a strong, deliberate bias in the direction of flight departures/arrivals constitutes a planned decision to worsen health outcomes for people in the Burley in Wharfedale/Menston/Ilkley area (all within Bradford district).
- The population is continuing to grow in Wharfe valley. For example, Bradford Council has 1,300 new homes planned in the next plan period and recently approved a 500-home development in Burley in Wharfedale alone.
- Over the last 25 years, the nature of flights from LBA has changed. It used to be mainly small commuter aircraft flying to places such as Edinburgh, Glasgow and Heathrow. Since the arrival of low-cost airlines in the 2000s, not only has the number of flights gone up, but the planes are much bigger, noisier and more polluting. Therefore, directing 80% of flights in one direction is impacting/will impact on the health of those residents in a deliberate manner.

- Despite what some people may think, wind direction is not a major factor in determining the direction LBA flights take off in. The runway 14 - 32 does not face into any prevailing wind which would assist take-off and landing. At no point during departure from runway 32 does an aircraft fly into the prevailing westerly (258.75° - 281.25°) or west-south-westerly (236.25°- 258.75°) wind. Runway 32 has a heading of 320° towards the north west. Effectively, the wind blows across the runway, not face into it. **As mentioned, LBA currently operates a deliberate preferential runway scheme**, whereby the Westerly runway (32) will be used for take-off and landing in preference to the Easterly runway (14) when the tailwind component is no greater than 5kts and the surface is dry. **The choice of runway remains that of AIR (Air traffic Control at Leeds) .**
- For the avoidance of doubt, removing the preferential runway scheme will not adversely affect flight times or fuel economy. Aircraft will still be able to join the SID's (Standard Instrument Departure) routes at DOPEK, LAMIX and NELSA, as is the case currently.

If Bradford Council genuinely cares about the climate emergency and "*taking action to tackle air quality problem*", then the Council would not have collaborated in the airport expansion and would at the very least now be asking for a condition on the planning application approval to ensure a 50/50 split of flights between the Wharfe valley and Leeds directions. Failure to tackle these issues amounts to compliance in a planned worsening of health outcomes for people in the Wharfe valley. In addition, it damages Council's credibility in tackling climate change and protecting people's health.

From 5. b "*Wherever possible maximises the use of previously developed land.*" and from d "*Minimises the use of Green Belt land.*"

I agree with the statements made here. However, in the broad context of the consultation I find that "1.2.9 *Prioritising the allocation of brownfield and non-Green Belt sites first and then taking a measured and sensitive approach to Green Belt release where further growth cannot be accommodated within current settlement boundaries.*"

But in the context of the Local Plan, the first 5-year period sees the release of the following, according to the supplied statistics:

- Brownfield homes - 666
- Greenfield homes - 648
- Green Belt homes - 621 (77% of which are planned at Sun Lane in Burley)

This is despite Brownfield being capable of contributing a further 8,258 homes and Greenfield being capable of delivering 5,340 homes, ahead of any Green Belt allocation. It fair to say, therefore, that

Council are not prioritising the allocation of Brownfield and non-Green Belt sites first.

Question 3.

**Policy SP2: Spatial Priorities.**

**A ...achieve sustainable development in line with National Planning Policy Framework and Policy SP1a/b.**

My view about sustainability is expressed in the response to Question 2.

**B .Planning decisions as well as plans, strategies, programmes and investment decisions should seek to:**

From 8. *"Ensure a move towards a green economy and a resilient lower energy and low carbon future"* This again contradicts Bradford Council's support for LBA's expansion plans.

Question 4.

**Policy SP3: Hierarchy of Settlements**

**Local Growth Centres**

*"3.3.9 They are the most sustainable local centres and vary in size and function but fulfil a significant role as settlements along key public transport corridors providing attractive and vibrant places for their surrounding areas. These centres will provide an important focal point for affordable housing and market housing needs as well as employment and associated community facilities - complementing and supporting the roles of the Regional City of Bradford, Sub Regional Town of Halifax and the Principal Towns of Skipton, Ilkley, Keighley and Bingley."*

It is clear to see from the above statement and data supplied that the demographic of each of the Local Growth Centres are different, as I would expect. However, in regard to affordable housing, each of these areas have huge variations in the quoted affordability ratio, which are based on each area's average income.

Burley in Wharfedale has the highest Q<sub>1</sub> affordability ratio of all, at **5.03** times the settlement's average income. To suggest that affordable homes are to be delivered in Burley in Wharfedale is at best questionable, given the district's average income of **£36,871**. The average affordability ratio in Burley is at least **6.82** (almost 7 times the district's average household income), so it is not clear how affordable housing delivery in Burley in Wharfedale addresses the need of those living elsewhere in the district, with many household incomes of less than £20,000 (See **Question 9, SP8: Housing Growth** for further information). This of course assumes that homes are priced for the lower quartile, at a market price of no more than £250,000.

Affordability ratios are given in the Local insight guides. **[Appendix 1 - House Prices]**

They are:

Local Growth Centre	Average Household income	Q <sub>1</sub> ratio (lower quartile - lowest 25%)
Silsden	£40,400	3.88
Steeton	£40,400	3.81
Burley in Wharfedale	£49,263	5.03
Menston	£54,600	4.20
Queensbury	£42,600	2.43
Thornton	£40,500	2.53

Equally, as I am sure Bradford Council are aware, affordable home payment contributions can be made in lieu of delivery of affordable housing provision on site. This caveat appears in the Sun Lane Section 106 agreement made between CEG and Bradford Council, held by Bradford Council (A copy can be supplied on request). It undermines the purpose of Core Strategy policy H05 and the statement at 3.3.9.

If Bradford Council have a genuine commitment to deliver affordable housing in Burley in Wharfedale and elsewhere across the district, why is there a need to include this caveat at all in Local Plan policy? Can Bradford Council provide a good explanation of why this mitigation is required at any site across the district? Can the Council also commit to ending this practice?

I would also like to understand what employment opportunities Bradford Council are given to believe exist within Burley in Wharfedale that would support the employment assertion made in 3.3.9? I would like Bradford Council to supply supporting evidence alongside any response. None appears for Burley in the Local Plan, other than a small retail study and an indication of how many self-employed people there are.

*"However, as a rural location there is not a substantial amount of employment activity, in the industrial sector as topography is a major constraint."* [Source - Employment needs assessment - July 2019]

## Question 5

### SP4: Location of Development

This section emphasises the need to redevelop previously developed land (PDL), which is also referred to as Brownfield (BF) in the Local Plan. Using both terms make matters even more challenging to an uninitiated reader.

"3.41. It placed a strong emphasis upon the use of deliverable and previously developed land and the use of existing urban areas, with a focus upon minimising the amount of dispersal of development to edge of settlement locations and the need for changes to Green Belt."

"3.4.2 The policy was redrafted in the CSPR to focus upon limited Green Belt release without specific reference to the potential scale of the Green Belt release site."

I have already stated my thoughts about Brownfield delivery in Question 2.

A clear plan of action needs to be taken to remedy existing challenges, otherwise we're not delivering the Local Plan's promise as emphasised above and in the following policy statement. "3.2.11 There is a clear thread running through the Local Plan of supporting the renewal and regeneration of our urban areas and brownfield sites."

## **Question 6**

### **SP5: Green Belt**

"3.5.3 In accordance with paragraph 137 of the NPPF, before concluding that exceptional circumstances exist, the local planning authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, and whether the plan:"

I would like to understand Bradford Council's definition of 'exceptional circumstances' in the context of the NPPF.

It is arguable whether the Council "examined fully all other reasonable options for meeting its identified need for development." Whilst I accept that some elements of Brownfield are unviable, I find it hard to understand why land that would support the delivery of significant housing volume still remains unviable 16 years post identification.

### **Meeting Housing Need and Optimising Brownfield Potential**

"3.5.4 Policy SP8 Housing Growth sets out the proposed housing requirement for the district which after making an adjustment for clearance and windfall results in a need to make further provision for at least 27,672 dwellings over the plan period 2020-38. When taking into consideration carried forward sites under construction and full planning permissions (a contribution estimated to amount to around 5,774 units) this leaves a need to find new allocation land for just under 22,000 dwellings."

Let me consider at the data provided by Bradford Council for the plan period. [Appendix1 - District Housing Allocation] Looking at the housing summary for each area of the district and segmenting the data according to the Council's classification, PDL and BF (Brownfield)

account for 8,924 homes, Greenfield 5,988 homes and Green Belt 5,183 homes Mixed 1,833 and 382 miscellaneous homes.

I would also like to draw the attention of Council to the unoccupied housing that could contribute to this figure. We have *[Appendix 1 - District Housing Allocations]* :

- Bradford City Centre - 285, Bradford NE - 932, Bradford SE - 941, Bradford SW - 1,386, Bradford SE - 1,200, Canal Road Corridor - 97. Total vacant: 4,841 homes.
- Shipley - 464
- Bingley - 326
- Keighley - 968

Surely these need to be subtracted from the housing requirement figure ahead of finding new land allocations. This reduces the new housing requirement from 22,000 down to 15,401. If I then add 'unviable' Brownfield that figure reduces still further. This is a very important point as it throws a completely different perspective on where housing and regeneration efforts need to be directed.

*"3.5.13 In plugging the gap between employment land need and supply through non-Green Belt sites, no neighbouring authorities have come forward to date through Duty to Cooperate discussions to take any of the District's employment land need outside the confines of the Green Belt. There is also the question over how such a strategy would practically support local jobs and respond to Bradford specific economic growth needs."*

This wouldn't contribute to the district employment needs because, *"3.31 ... Bradford District is a self-contained housing market area for the purposes of planning policy."* *[Source 2019 SHMAA]*

## **Question 7.**

### **SP6: Economic Growth**

*"3.6.1 Bradford's economy is underpinned by a range of important factors which define its future growth. Bradford has a growing and changing household structure with a large proportion of the population made up of people in the lower age groups and therefore a growing potential labour force."*

*The statistics given in the SNPP, which informs this policy, clearly show that across the plan period, the number of people in lower age groups is a shrinking, not a growing proportion of the population."* **[Appendix 1 - SNPP]. If I look at the SNPP I can clearly see that growth comes from the ageing populous.**

*"3.6.4 Prior to the pandemic, the District already faced a number of deep rooted economic challenges, including:*

- *unemployment, worklessness and economic inactivity above regional and UK averages, while the working age population is growing;*
- *skill levels are below regional averages and the proportion of people with no qualifications is growing;*
- *the District is a low pay area reflecting weak private sector jobs growth and too few high value knowledge businesses, and"*

As previously stated, the working age population is in decline according to the SNPP.

### **Employment Land Need and Jobs**

*"3.6.8 The Strategy will help foster the District's indigenous companies and also attract the inward investment into growing the green economy and high value, creative and knowledge-based industries by providing an attractive high-quality environment across the District and quality development sites in the most advantageous locations for the market economy."*

Yet again we're stating that jobs will be created from knowledge-based industries, those identified in the 2007 '**2020 vision.**' Council has failed to deliver that goal for the past 13 years.

Similarly, how do you attract that type of industry investment when in 3.6.4 you have identified that *"the proportion of people with no qualifications is growing;"*?

Surely, the common sense approach should be to ensure that employment needs align with the district's strengths. This is the case in the private sector.

Expressed in simple terms - play to your strengths, re-deploy and retrain workers so that they can contribute to the demands of delivering the green economy. For example, boiler installers need to be trained as heat pump or hydrogen heating installers to help retrofit homes (retrofitting all existing housing across the UK/district is going to be an expanding industry and will take several decades to complete the work).

*"3.6.9 In recent years, the Bradford urban area, Bradford City Centre, the M606 corridor and Airedale have been the main centres of the District's economic regeneration successes and achievements. Policy will continue to exploit their roles as dynamic locations of choice for future economic growth."*

In respect of the above, why are Council suggesting Green Belt release on the opposite side of the district? Housing needs be located close to centres of employment; this is a more meaningful and considered approach which aligns with the transport strategies need to reduce reliance on motor vehicles. In turn this closely mirrors Council's ambition to deliver a 'greener economy.'

## Employment Land Need and Jobs

*"3.6.8 The main economic focus of the Local Plan is to create the conditions where business thrives, generating opportunities to deliver jobs growth and prosperity across the District."*

I fail to see how this policy differs from the Core Strategy: Issues and Options Topic Paper 4: Economy and Jobs in 2007's LDF. Simply restating the existing policy will not change the outcomes.

*"3.6.12 Accordingly, there is the potential for the future outturn to be more positive than the forecast suggests. On the other hand, it is also noted that some forecasting houses forecast stronger contractions in the Manufacturing sector than the Experian REM model. Furthermore, post-Brexit trading arrangements may impact adversely on the sector."*

3.6.13 Whilst the REM model provides the strongest guide<sup>[1]</sup>, it is noted that:

- 1. Some other forecasts (e.g. Cambridge) tend to typically project lower levels of growth (and specifically larger future contraction in the manufacturing sector).*
- 2. Historic employment data from BRES indicates that Bradford has underperformed in terms of employment growth (although there is some evidence of improvement in recent years)."*

<sup>[1]</sup>What is worthy to note here, is that Bradford Council have elected to use the REM model as the de-facto measure to forecast employment growth.

Having looked at this quite objectively, alongside other evidence used to inform the Local Plan, I have to question the credibility of the statement made in 3.6.13 on the basis of 3 reports:

1. Let us look at both the Experian and Cambridge econometric models [\[Appendix 1 - Experian Plan & Cambridge Econometrics\]](#).

A few examples illustrate the issue with the adopted approach, namely:

The Experian data table reveals head count growth in key sectors of Health and Residential Care and Social Work, which aligns with the SNPP's forecasted growth in 65+ year olds. The same model also predicts substantial growth in Education head count, which is at odds with the data in the SNPP, which shows a reduction in those aged 0-16 years.

Similarly, the Cambridge model predicts a slight increase in Education head count; that is more in keeping with the decline in the 0 - 16-year-olds in the SNPP forecast. Health is predicted to grow at a similar rate to the Experian model, but overall, the Cambridge model shows a more rapid decline in the manufacturing sector.

The reason for a modest growth in manufacturing between 2009 and 2019 are simply that Bradford has a manufacturing-based economy.

2. Jobs over the previous decade were once again predicted to grow at pace. However, commuting in / out of Bradford shows a net outflow of around 10% (5,300 commuters), which is a similar order of difference, but reverses the pattern seen at the time of the 2001 Census, when broadly 45,000 commuted in and 40,000 commuted out (a net inflow).

Commuting flows indicate the relative attraction and quality of jobs in an area. Areas with high quality productive jobs tend to be net importers of commuters.

3. Lastly, the SNPP forecasts a decline in all but 2 age ranges in the forecast to 2041, and whilst the overall population is set to grow, the increase in growth is predominantly in the older age brackets, 55 to 64 years, and 65+ years. [Appendix 1 - SNPP].

In conclusion, it would therefore be prudent that future employment growth is calculated by considering the outcomes noted above, all of which are supported by the data, rather than to simply adopt an approach that factors none of these issues into account.

From the Experian model, there is a predicted growth of 9,100 jobs in the plan period. The Cambridge model yields an increase of 1,986 in the plan period.

Both Experian and Cambridge models lie quite some distance from the projected growth given in the Future Employment Analysis (EANLR addendum 2021), which predicts the creation of 26,000 jobs between 2019 - 2038. To suggest that this figure is realistic in comparison to long-standing Experian or Cambridge data modelling outcomes is questionable. Here again, it will be interesting to measure the outcomes of all 3 against the 2021 census result.

### **Economic Strategy.**

It is interesting to see how some of the policies detailed in this section are going to deliver substantive results. In earlier policy, dating back to 2007, Council talked about upping their game. Since then, little, if anything, has changed.

In point 3.6.19 I see an acceleration towards a "*greener new economy*." After that there are a set of aspirational statements with little substance to them, to support the outcome. Where are the bridges into private enterprise, where are the skills required to transform Bradford into a knowledge-based economy?

The approach is the same as that of years gone by unlocking potential through interventions and priorities, such as education and skills. I simply cannot give any credence to identical policies worded slightly differently. If they have not worked over the past 15 years, which is self-evident in the Local Plan - "*skill levels*

*are below regional averages and the proportion of people with no qualifications is growing;"* then the actions need to be changed to affect the outcome. This is quite clearly recognised in "3.6.21 *The REM forecasts indicate that approximately 75% of future jobs per annum is expected to be generated by non-B use class jobs.*"

This is a wakeup call for Council, albeit a bit late, and Council have already wasted 14 years trying to solve this issue. There is a real danger that Council is going to continue to make the same mistakes for another 17 years.

Council needs to recognise that their approach needs to be changed to address a very fundamental issue. It is impossible for Council to retrospectively change educational outcomes on the scale required, so the focus needs to be tackled at grass roots starting with the current generation of children starting in education.

Many who are already employed in the district's job market will need retraining, to enhance or deliver new skills. Council is still trying to resolve this long standing issue, so the current approach needs to be questioned.

## **Question 8**

### **SP7: Planning for Sustainable Transport**

*"3.7.4 This policy framework confers a high degree of priority - and some urgency - to projects which enable cycling, seeking to integrate all parts of the District with high-quality, segregated cycling routes conforming to the latest standards."*

This policy, although perfectly reasonable, fails to solve the need to travel across the district - *"in too many places in the District, people are excluded from travel if they do not have access to a car, creating transport poverty."* Electric bikes are part of a much more confined local solution, but I doubt whether many people will travel by bike in adverse weather conditions, like rain, snow and ice.

*"3.7.5 The transport policies in this plan also confer a high priority to strategic transport projects which enable better regional agglomeration for the purposes of economic growth at the same time as encouraging more people and goods to travel by rail."* Once again, a good forward-thinking strategy, but this relates to regional rather than district travel. The district's travel infrastructure should be the Council's priority and needs to be the focus of transport policy, this then needs to align with regional systems.

*"3.7.12 Location of Development - The Council will attempt to focus future development growth in areas with greatest levels of accessibility to sustainable transport modes, including public transport, walking, and cycling. Where these do not currently exist, provision will be prioritised for delivery and identified within the Local Infrastructure Plan (LIP) which accompanies the Local Plan, the emerging Bradford Transport Strategy and other corporate and*

*WYCA investment programmes.*" As I have seen elsewhere, the transport policy is not defined, has no set budget and no timetable for delivery, in Burley in Wharfedale or throughout the district. So how do Council expect to respond to the 'rapid change' required in the NPPF if basic targets and budgets have not been decided, agreed or ring-fenced?

### **Transport poverty.**

Council have neglected to consider a transport subset in policy. Rail connectivity is reasonable across the district; however, timetabling issues are an issue for shift workers. Rail and bus services operate between 6.00am and 11.30pm. So how are shift workers, particularly those who are classed as being in 'transport poverty' supposed to get to work?

### **Mode Shift and Structural Change**

When do Bradford Council anticipate that the Bradford Transport Strategy 2040 will be fully documented and funded for public digestion? The WY Transport Strategy has been on the table since 2017, in that time I have seen:

- opening three new train stations since December 2015 at **Apperley Bridge (Bradford)**, **Low Moor (Bradford)** and Kirkstall Forge (Leeds)
- opening a new Southern Entrance to Leeds Station
- opening two new bus park and ride sites at Elland Road and Temple Green (both Leeds)
- opening a new bus station at Castleford and a public transport hub at South Elmsall (Wakefield)
- commenced the doubling of the number of car parking spaces at rail park and ride sites across West Yorkshire, from 1,800 to 3,600
- created space for parking for over 200 cycles at rail stations including opening secure cycle hubs at Huddersfield and Dewsbury (Kirklees)
- opened 23km of new Cycle Superhighway between **Bradford and Leeds**, and 14km of towpath improvements to the Leeds Liverpool canal.
- opened Wakefield Eastern Relief Road
- developed new Smart Card products for public transport customers

Plus, the ongoing annual investment of £19 million per year in community bus services, although there has been a reduction in bus

patronage of 48.3 million annual trips over the last decade (2007-2017). [Source - <https://www.westyorks-ca.gov.uk/media/2379/transport-strategy-2040.pdf>]

## Question 9

### SP8: Housing Growth

My response to this question is fully detailed in **Question 6** above - [Meeting Housing Need and Optimising Brownfield Potential](#)

*"3.8.45 In recent years a significant proportion of all new homes have been provided on land which has been previously developed or in buildings which have been redeveloped."* I would like to know more about this proportion of housing, specifically the number of homes delivered on PDL/Brownfield, Greenfield and Green Belt. This is not shown within the Local Plan paperwork.

### Specialist and Affordable Housing

*"3.8.50 The Council and this Plan has a key role in ensuring that there is an adequate delivery of affordable homes within the District in the light of the level, type and distribution of need revealed by the updated SHMA"* Evidence in the SHMA does suggest that at least 25% of the housing requirement should be affordable homes, as defined by national policy. This was the case in earlier SHMA's, and yet the issue persists, and this raises yet more questions. Delivered affordable tenures over the last 5 years stand at 17% of the housing total, not 25% as required by national policy.

The issue here is not one of affordability, rather it is one of income and social housing. Affordable housing is required; the problem is district household income. Affordable social housing needs to be delivered at a very low starting price. That presents housing associations and organisations like "Incommunities" some real challenges. Having been in dialogue with such organisations, it's clear that they struggle to buy new-build properties in the district (they're simply too expensive) and then socially rent these to those most in need. The figures simply do not stack up; housing associations would realise zero or negative returns to their balance sheets.

### **The issue of affordability.**

In terms of income, the 2019 Household Survey identified that across the City 40.4% of households receive less than £18,200 gross per year. This means that 40.4% of the population receive less than the district average of £36,871 household income, making it impossible for people to buy a home. This is clearly illustrated by the high levels of households across the district living in rented accommodation.

What is needed is affordable social housing that's geared towards the 40.4% who are not being catered for in the Local Plan.

## Reasonable Alternatives

I accept that it is inevitable that some housing need must be met from Green Belt, however, my previous comment remains about housing viability in Question 5 above.

I would also wish to draw to the Council's attention that Burley's housing allocation in this section is stated as 326 units, not the 625 houses shown in the Local Plan.

### **The Government's approach to affordable housing.**

The Government considers housing affordable where it is social rented, affordable rented or intermediate housing such as shared ownership or rent to buy. Rented housing is considered affordable if it costs no more than 80% of the local market rent.

That having been said, some money has been given to Council to address some of the brownfield issues that exist, and I understand that a further £67 million is being allocated to the combined authority.

### **Manchester's definition of affordable housing.**

Other local authorities like Manchester, have adopted a different definition. *"To be classed as affordable a property must cost no more, in rent or mortgage, than 30% of the current average gross household income of a Manchester resident of £27,000 (both earned or through benefits). This equates to up to £675 per month for rent and up to £121,500 (excluding deposit) to buy a home."*

What stands out here is that Manchester measure performance against their definition of affordable housing, *"In Manchester we review annual property sales to look at how many of our properties are affordable. In the last year 41% of all owner-occupied sales met our affordable definition."*

Why is it Council have not considered an affordable housing initiative like Manchester's? We have identical issues in Bradford only they are far more acute, especially across the City.

## Question 10

### **SP9: Climate Change, Environmental Sustainability and Resource Use**

Moving to a low carbon future. It is abundantly clear that Bradford Council are to adhere to para 148 of the NPPF, rather than to be the first to "raise the bar."

I would prefer to see mandatory delivery of energy efficient carbon-neutral housing, with Bradford Council taking the lead role in this initiative. This initiative has a defined set of outcomes that are easily measured against a simple set of KPI's. It would also align with the Local Direction at 3.9.8 helping to achieve a net zero carbon district by 2038.

The pros and cons to acting now are:

## **Cons.**

- Short term cost implications at time of purchase on new builds.
- If Council don't address the cost of zero emission/carbon neutral homes up front, we're effectively just kicking the cost further down the line.
- Future cost of making homes zero emission/carbon neutral is an issue government is currently trying to address on older housing stock. Many people will not be able to afford the upgrade cost (no economies of scale, complex installation), so work may never be carried out. A good analogy would be the introduction of solar panels. Consider how few homes have migrated to solar to date.
- Further government subsidies to encourage take up of zero-carbon measures are a cost burden to the taxpayer. These subsidies could be put to better use elsewhere in the economy.
- Carbon output will be maintained until such time that zero carbon upgrades are installed, making it more difficult to achieve defined Carbon targets both locally and nationally.

## **Pros.**

- House builders and developers have the economies of scale to make homes zero emission/carbon neutral far more cheaply than individual homeowners/landlords.
- Zero percent VAT on these technologies at build, another opportunity to save money.
- This technology is far more easily installed before build, ready at point of sale.
- Installation up front will work out cheaper than delayed upgrade.
- Immediate CO2 benefits delivered towards government and local authority aspirations for a zero-carbon economy.
- Mortgage terms of 20 years plus, mean that this cost is spread over the term and is likely to be a minimal monthly charge.
- Immediate energy savings will help to offset the additional purchase and mortgage costs.

## Question 11

### SP10: Green Infrastructure

#### Engraining Green Infrastructure in Plan-Making

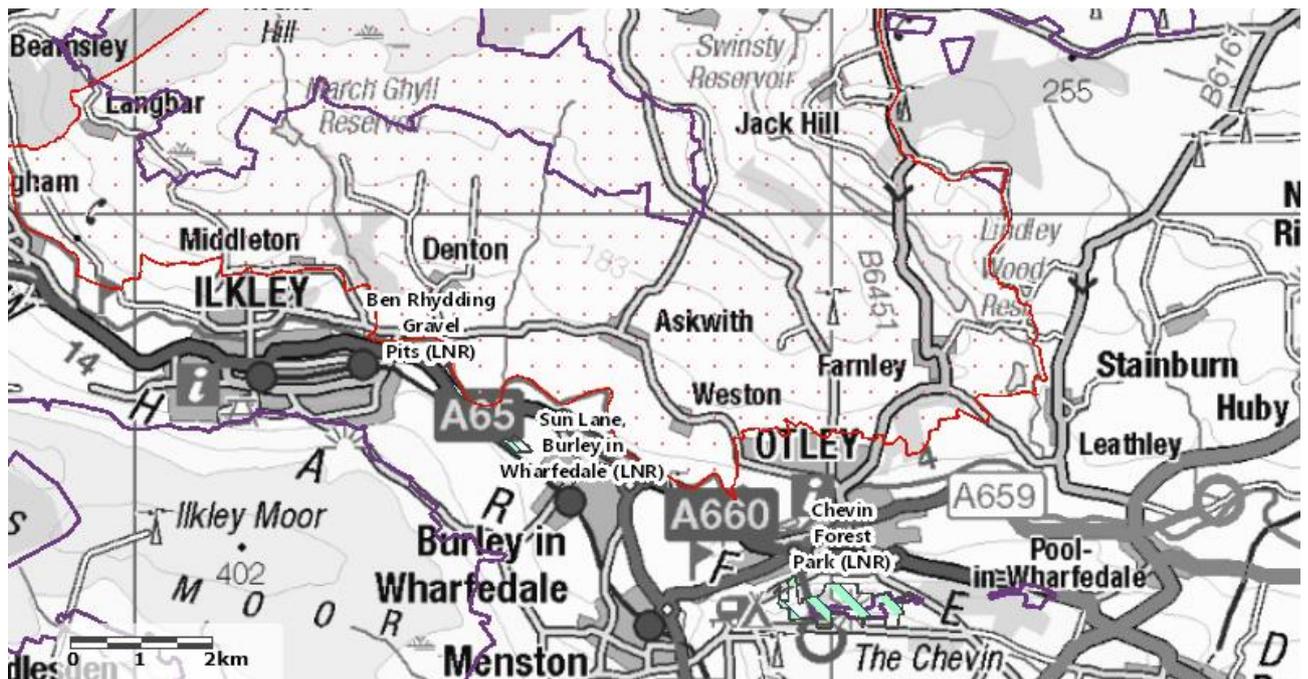
"3.10.6 *The aspiration to create space for both green and blue*". The details presented here should not be aspirational, as so many others are. The policy needs to identify and deliver green infrastructure (GI) as mandatory requirement of the Local Plan.

## Question 12

### SP11: Protecting the South Pennine Moors and their Zone of Influence

#### Habitat Regulation Assessment

"3.11.6 *Due to the proposed distribution of development the magnitude of the impacts varies between the different European sites. The HRA indicates that if left unmitigated, the potential impacts are likely to be greater in relation to the South Pennine Moors due to their relative proximity and accessibility to the proposed areas for development.*"



The HRA does not conclusively state that it is South Pennine Moors, rather than the North Pennine Moors, that will suffer from the impact of development at Burley In Wharfedale. It merely states a 'likelihood.' nor does the The HRA exclude the possibility of functional links to the North Pennine Moors (AONB), but it does conclude that "*the requirements of policy SP11 continue to be relevant.*" There is no mention or consideration of a functional link between Burley in Wharfedale and the AONB, despite its proximity to

the settlement. This need to be included and incorporated into the Local Plan along with the impact on the SPA/SAC. There are many river crossings along the River Wharfe which link to the AONB (SS SI). This is particularly true at Burley, where a river crossing is regularly used by visitors and residents to reach the AONB for recreational purposes.

Menston is roughly equidistant from the AONB and SPA/SAC, so similar considerations will apply.

### Question 16

#### SP15: Creating Healthy Places

I accept that this are a great set of aspirational policies which the plan seeks to deliver, but again there's little evidence of fiscal or forward planning to support delivery.

### Question 17

#### SP16: Working Together

There are another good set of goals here, however, I'm a little surprised to see that much of this is an 'Evolving Context.'

I am eager to understand your intentions to attract new business and new investment and solve the following issues.

- Short term - Is there a business delivery team that has clear focus, with well-defined objectives?
- Short term - there is an immediate need to reskill a manufacturing workforce.
- Short term - Adopt and implement a strategy to reverse the decline in education standards, that has persisted for many years. The current strategy is not working.
- Short term - turn unviable brownfield into viable brownfield. The approach taken of the last 15 years is not working and cannot be the basis of the policy going forward.
- Medium term - set to change the course of the district economy from manufacturing to a 'greener' and knowledge-based economy.
- Long term - how you intend to stay ahead of the curve in employment terms.

I have made and presented a few suggestions in my response, so perhaps you might indicate how Bradford Council is to address each of the above and measure success or failure.

## Question 24

### TR3: Integrating Sustainable Transport and Development

We would agree that strengthening the integration of sustainable transport into new developments is essential to the delivery of the Local Plan, moreover, council suggests that development is unsustainable where "4.8.2 where car trips are reduced by between 0% and 30% of local prevailing rates, and active and public transport modes have parity in access with private vehicles." Clearly this is an issue in Burley in Wharfedale and without doubt, elsewhere across the district. But there is another disconnect here in terms of priorities which I'll consider further in my response to Question 118 that's been overlooked in the context of the Local Plan's 'sustainability' objectives.

## Question 29

### H01: Housing Delivery, Strategic Sites and Managing Growth

Council have clearly identified all sites, including strategic sites, are specified, and allocated in Section 5 of the Plan. These are shown in Table 4.14.1 Bradford Council refer to both the Preferred site reference and the SHLAA reference, for example SI3 & SI4 are Preferred site references, and SI20 is a SHLAA reference making the table more complex to analyse.

The table produced appears to be incorrect, looking at housing allocations and sites in the District's Housing and showing land type and delivery times yields more information to inform the reader:

#### Legend:

**GB** - Green Belt **GF** - Greenfield **PDL** - Brownfield (Previously Developed Land)

MIXED - mixed Others GF- %, % PDL, exact split where indicated

**Red entries**, those not included which match the given criterion.

Location name	Area name	Preferred sites	Dwellings	SHLAA Ref	Timescale from	Timescale To	Land type
<b>Sites in Cluster delivering over 400 units</b>							
Burley in Wharfedale (LGC)	Sun Lane / Ilkley Road	BU1/H	500	BU/001	0	11	GB
Canal Road Corridor	New Bolton Woods	CR8/HC	923	CR/011/CR019	0	18	MIXED
Bradford South East	Holme Wood	SE47/H	542	SE/099	6	10	GB
Bradford City Centre	Top of Town	CC12/H	500	CC/038	6	11	PDL
Canal Road Corridor	Bolton Woods Quarry	CR2/H	762	CR/014	6	15	PDL
Bradford South East	Holme Wood	SE46/H	582	SE/100	11	15	GB
Bingley	Sty Lane	BI2/HC	440	BI/008	0 to 6	6 to 10	GF

Sites over 400 units

4249

Location name	Area name	Preferred sites	Dwellings	SHLAA Ref	Timescale from	Timescale To	Land type
<b>Cluster sites delivering over 400 Units</b>							
Bradford City Centre	Goitside	CC7/H	300	CC/024	6	11	PDL
Bradford City Centre	FLC	CC15/H	300	CC/044	6	11	PDL
Bradford City Centre	FLC	CC16/H	300	CC/045	6	15	PDL
Bradford North West	Heaton	NW19/H	300	NW/049	6 to 10	11 to 15	GF-95%, 5%P
<b>Sites in Cluster delivering over 400 units</b>			<b>1200</b>				

Location name	Area name	Preferred sites	Dwellings	SHLAA Ref	Timescale from	Timescale To	Land type
<b>Sites of Significance for delivering Settlement Targets</b>							

Bradford South West	Cluster sites	SW3,4,9,18	282	Excludes SW5/H below	6	11	PDL
Bradford South West	Great and Little Horton	SW13/H	281	SW/033	6 to 10	11 to 18	PDL
Shipley	Shipley Tax Office, Shipley	SH9/H	266	SH/052	6	11	PDL
Queensbury (LGC)	Old Guy Road / Fleet Lane	QB7/H	260	QB/014A	6	15	GB
Thornton (LGC)	Thornton Road West	TH8/HC	250	TH/027	6	15	GF
Bradford City Centre	Goitside	CC3/H	250	CC/011	6	11	PDL
Bradford North West	Manningham	NW21/H	250	NW/054	6 to 10	11 to 15	MIXED
Bradford South West	Royds and Wibsey	SW14/H	200	SW/034A	6	10	GF
Bradford City Centre	Goitside	CC2/H	200	CC/007	6	11	PDL
Bradford City Centre	CCBL	CC13/H	200	CC/039	6	11	PDL
Bradford South West	Great and Little Horton	SW17/H	200	SW/043	6	10	PDL
Bradford North West	Allerton	NW32/H	200	NW/125	6	10	PDL
Bradford North West	Heaton	NW36/H	195	NW/131	6	10	MIXED
Bradford City Centre	Learning Quarter	CC29/H	190	CC/114	0	5	PDL
Bradford South West	Clayton and Clayton Heights	SW33/H	175	SW/003 + SW/124	6	10	GF in GB
Bradford South West	Clayton and Clayton Heights	SW15/H	175	SW/035	6* (0)	10 * (5)	PDL
Keighley	Keighley NW	KY4/H	173	KY/015	6	15	PDL
Shipley	Glenview Drive, Bankfield Road, Nabwood, Shipley	SH4/H	164	SH/026	6	11	GB
Menston (LGC)	Derry Hill	ME2/H	161	ME/003	0	5	GF
Bradford North West	Allerton	NW10/H	160	NW/024	6	10	GB
Siilsden (LGC)	Keighley Road	SI5/HC*	156	SI/020	0 to 6	6 to 10	PDL
Cottingley	Marchcote Lane	CO1/H	155	CO/002	6	15	
Ilkley	Coutances Way	IL3/H	155	IL/014	6	11	
Bradford South West	Great and Little Horton	SW24/H	151	SW/016B	6	10	PDL
Bradford North East	Barkerend	NE7/H	150	NE/035	5		PDL
Thornton (LGC)	Thornton Road (1)	TH2/H	150	TH/003	6	10	GF
Bradford South West	Clayton and Clayton Heights	SW5/H	150	SW/010A	6 to 10	11 to 18	GB

Sites of Significance for delivering Settlement Targets

5299

Or a total contribution of 5,864 according to table 4.14.1 or 10,748 according to the above with small sites contributing a balance of 11,172, according to the analysis of housing figures shown in the plan. These figures are based on the whole of the plan period and do not consider co-ordination with service and infrastructure provision, which Council have noted throughout the plan.

### Managing Housing Delivery

What is noticeable in the above, that all sites other than those delivering 400 houses or more, are not scheduled to start delivering until 2027 at the earliest. Many of these sites are close to the

district and employment centres which are already adequately served by local infrastructure, so it is confusing and unhelpful to see the following plan statement:

*"4.14.10 The adopted Core Strategy Policy H04 includes proposals for the phased release of housing land. The effect of this policy is to hold back a proportion of sites until later in the plan period and was considered necessary in the light of the scale of housing development proposed and the need to manage growth and change in a sustainable way."* and also *"4.14.11 The Council still considers it vital to manage housing growth in a sustainable way and there may be occasions where sites may need to be held back pending the implementation of other proposals, such as essential infrastructure."* having already acknowledged in Wharfedale that *"At peak times these services already run at capacity "* and that *"upgrading should be considered."*

As I can see from the above, the Council's number 1 priority is to deliver 500 homes in Burley in Wharfedale on Green Belt, rather than taking the brownfield first policy approach.

**Question 30**

**H02: Housing density**

I agree that land use needs to be efficient in both city centre and rural settings. Revisions to increase the target minimum from 35 to 50 per hectare need careful consideration but could assist in the delivery of affordable homes.

We would suggest that apartments should be a part of the housing mix. Apart from being less expensive to build, apartments have a smaller total land footprint, are ideal for increasing housing density above the minimum 35 dpha and, if built correctly, can support the Council's Climate Emergency goals.

**Question 33**

**H05: Affordable Housing.**

Understandably I have growing concerns about the approach adopted in respect of affordable housing policy, which I have expressed elsewhere.

There is a wealth of evidence in the Local Plan that should be used as an input to this policy, and it has clearly had little or no consideration and frankly I am very surprised. Here are the suggested targets used in policy H05.

Affordable housing Area	Brownfield Target	Greenfield Target
Zone 1: Wharfedale	35%	40%

Zone 2: Towns, suburbs and villages	20%	25%
Zone 3: Outer Bradford and Keighley	10%	15%
Zone 4: Inner Bradford and Keighley	10%	10%

Candidly, I would agree in principle to the figures for Zone 1 & 2. Zones 3 & 4 lack any real credibility of the basis of data that supports the Local Plan. These are:

1. The figures for zone 3 and zone 4 show that of 140,286 homes, 76,459 are rented, that's 54.5% of the total occupancy.
2. I have also noted in the Local Plan that these areas are amongst the most deprived throughout the UK.
3. In the 2019 SHMA, and within the Local Plan (4.18.3) it is clearly shown that 25% of the total district's housing need is for affordable homes.

This policy lacks any credibility on the basis of fact.

#### **Mitigating delivery of affordable housing on site.**

Affordable home payment contributions can be made instead of delivering affordable housing provision on a development site.

If Bradford Council have a genuine commitment to deliver affordable housing across the district 'to level up', why is this even considered in the Local Plan? There is no justification or basis on which this policy is built.

#### **Question 118**

#### **Transport and Access**

*"5.16.10 The A65 and A660 are the primary trunk roads linking Burley with Ilkley to the west and Otley to the east. Both of these have localised traffic management issues. Most people use the car to travel to work, some 60% of journeys with multiple-car ownership above West Yorkshire averages. Therefore, given the frequency of travel and the preferred mode of travel, new development in Burley will need to be considered in terms of the road infrastructure both within the Wharfe valley, and also along the main commuting routes to Leeds and Bradford."*

The A65 is no longer classified as a trunk road. It was detrunked in 1992, a fact confirmed by BDMC's and CEG's barristers. This change in status took place in 1992, when it became a primary route. <sup>[1]</sup>

Trunk roads are controlled by central government or by one of its agencies.

Primary Roads are roads that link the 'primary destinations' - a fixed list of 'places of importance,' meaning large towns, cities and important bridges and tunnels.

Council have recognised that improvements to the road network need consideration. However, there are no detailed actions in the Local Plan. There is a need to not only mitigate local traffic management issues, but also a need to mitigate issues caused by frequent flooding along the Wharfe Valley on both the A65 and A660, both of which are commuter corridors used to connect Burley to Bradford, Leeds, the Principal Towns of Bingley, Ilkley and Keighley as well as towns and cities outside the district.

Responsibility for the A65 remains that of Bradford Council. The A660 lies within both the Leeds and Bradford Districts, where there is a duty to co-operate to resolve traffic management and flooding issues.

The NPPF, Section 2 we find "*11. Plans and decisions should apply a presumption in favour of sustainable development.*" notably "*(a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;*".

There is no evidence that development needs in Burley in Wharfedale are being met, just a recognition of the fact that something needs consideration. There is insufficient clarity on exactly what the development needs are of different areas in the district and no action points.

Similarly, at point "*5.16.11 Despite Burley's good rail connections, only 17% of journeys to work are made by rail. The line along the Wharfe Valley provides fast and convenient services to the employment and services in the key regional centres of Leeds and Bradford. At peak times these services already run at capacity and with new development and increased population, upgrading should be considered.*"

The Local Plan is merely 'considering upgrading' at Burley in Wharfedale.

Looking at Burley in isolation is a misguided approach adopted by Bradford Council. Over 1,300 new homes are planned in Wharfedale, in addition to those already delivered/approved. This further exacerbates the absence of any infrastructure planning for transport. Bradford are preparing a separate transport policy, which is currently in the planning stage. This plan seeks to address transport infrastructure issues and aligns with regional plans adopted by WYCA on August 3<sup>rd</sup>, 2017, which identified that:

*"A constraint faced by Bradford District is its relatively poor connectivity on to the regional and national road and rail networks, which is why significant investment in improved rail connectivity is seen as central to the city and the district areas in realising*

*their economic potential.*" Source: <https://www.westyorks-ca.gov.uk/media/2379/transport-strategy-2040.pdf>

After 3 and a half years since the WYCA statement, and after 6 years since the Core Strategy adoption, the Bradford Local Plan states:

*"2.8.13 The Council is currently in the process of preparing a Bradford Transport Strategy 2040. This will sit alongside the West Yorkshire Transport Strategy 2040 and set out a vision for the future of transport within the district."*

The proposed Local Plan in Burley in Wharfedale does not meet the development needs of our area, because transport plans, goals or delivery timetables do not exist. Therefore, the Local Plan in Burley in Wharfedale (and Wharfedale) is incapable of being sufficiently flexible to adapt to rapid change (such as increased demand for train services or significantly increased traffic flow).

In a separate email from Bradford Council, they state that *"it remains the plan to increase peak-time capacity on Airedale and Wharfedale Line services. There are of course risks associated with this, mainly relating to funding and the impact on demand that COVID-19 may have."* This statement is not present in the Local Plan documentation and further highlights potential issues affecting delivery and the 'sustainability' of Burley in Wharfedale in the context of the NPPF.

#### **2011 Census data affecting transport and access policies.**

Commuting flows indicate the relative attraction and quality of jobs in an area. Areas with high quality, productive jobs tend to be net importers of commuters. Commuting data is only collected in census years.

The 2011 census shows that 55,755 of Bradford District's workforce commute to other districts (predominantly Leeds - 27,500) for work. The net outflow from the Bradford district in 2011 was 5,316. This is a complete reversal of the data seen in the 2001 census, which saw a net inflow into the Bradford District of around 5,000.

I am interested in seeing the outcome of the 2021 census and how this might affect projected economic growth in Bradford's Local Plan and wonder if the census might cause Council to reconsider its target housing figure in the Local Plan if data supports a decline?

#### **Transport conclusion.**

Bradford Council have failed to address sustainability as defined in the NPPF Section 2, paras 7 to 14.

There are no transport plans which currently exist to address transport infrastructure issues at Burley in Wharfedale, or elsewhere in the Wharfe Valley.

The 2040 transport strategic 'vision' is not yet defined for the Bradford District, nor does it provide any details of:

- Detailed infrastructure improvement requirements. At present they are simply being considered.
- No delivery timings for improvement to infrastructure.
- Fall back and recovery positions are not documented. This is the minimum requirement for the Local Plan to respond to rapid change.
- No set budgets, to ensure that these projects can be delivered on time, or at all.

All of which are required to achieve 'sustainability' as defined in the NPPF.

### Planning for homes

5.16.16 Average house prices in Burley are £310,671, which is far higher than the West Yorkshire average of £183,194. The total affordability ratio between house prices and annual earnings, which is usually used as a proxy for number of years' worth of earnings required for a house deposit, is 5.03 in Burley, compared to a West Yorkshire average of 2.96.

Using the lower quartile ratio (Q<sub>1</sub> 5.03) as a measure of affordability is misleading. The average affordability ratio should be used, and this is 6.57 (this will be closer to the median value than the lower quartile). It is important to note that the affordability ratio is a measure of Burley's average income measure against local house price, not the district's average household income which is £12,392 per annum lower.

Homes within Burley are, therefore, almost exclusively targeted towards people in a defined demographic subset (high earners), who live in the surrounding areas, or high earners who currently reside outside the district. There's little evidence to show that housing built in Wharfedale would meet the needs of the wider district community.

My primary concern about housing in Burley in Wharfedale is that it does not address an already established fact, that there is a district-wide need for affordable homes. This has been clearly identified within successive Strategic Housing Marketing Assessments (SHMAA's). This affordability need is clearly substantiated by the statistical evidence used to inform the Local Plan and is referred to in my responses to Spatial and Housing policies.

There is more evidence, within the pages of the Local Plan, that illustrates the demand for a particular type of housing in Burley in Wharfedale. That housing need lies at the bottom end of the scale and I wonder whether Sun Lane will deliver significant housing at this level, or whether housing will be predominantly 4- and 5-bedroom homes.

There clearly is a growing need for Semi-detached and Terraced housing and potentially apartments. Apartments are absent from BDMC's reporting and analysis, and this type of housing should be included. Besides being cheaper, apartments have a smaller total land footprint, are ideal for regenerating brownfield sites and, if built correctly, can therefore support the Council's Climate Emergency goals.

### **Education.**

"5.16.32 When planning for the long-term development, it is vital that new development is supported by the appropriate infrastructure."

This is another area where there is a growing issue that is exacerbated by planned housing developments in Burley and throughout Wharfedale. Ilkley Grammar School is the only secondary school which serves Burley in Wharfedale.

Ilkley Grammar is close to, or at capacity, even before additional housing delivery. Yet I note the following in the Local Plan - "*The Council will continue work with key infrastructure providers and others including the Local Education Authority, Clinical Commissioning Group and utilities providers to determine the impacts of future growth and development on local infrastructure capacity and provision.*" The implications of more housing are 'somewhat obvious' and will, without doubt, include an increasing head count at Ilkley Grammar - which is evident from the district's demographic.

I now understand that schools across the border in the Leeds District, closing their doors to admissions from the Bradford District. This is largely due to increasing housing numbers across district borders.

### **Education conclusion.**

The council need to adopt an AGILE approach to planning and execution, an approach which is currently absent from policy. Where are the required secondary school places in Wharfedale. The Sun Lane development will inevitably see the catchment area significantly reduced.

### **Question 119**

**BU1/H** This development is of 500 homes is now being delivered, and in addition to the 190 already delivered in the original Plan Period according to the MHCLG's ruling at Sun Lane, **point 358**. That means Burley In Wharfedale has met the set housing obligation detailed in the Core Strategy apart from 10 homes. 10 homes could be delivered as "windfall development" and such a contribution would fulfil Burley's requirement to deliver 700 homes in the current plan period.

**BU2/H** The additional contribution of homes at Scalbor would mean that Burley would exceed its housing allocation by quite a margin.

In the **Sustainability Appraisal** I see that "The site could deliver a major positive effect for residents on the health SA Objective as a result of being within the target distances for all necessary health facilities.

*Minor positive effects were predicted for nearly all other socio-economic themed SA Objectives due to the benefits of new residential development for the local economy as well as the location of the site in relation to transport links, local services and amenities, education facilities and employment areas."*

And earlier I see that

*"5.16.31 Burley has an NHS registered healthcare facilities within the town. Grange Park Surgery is the local GP's surgery. Secondary (acute) healthcare is provided at Wharfedale Hospital approximately 6km away. Average life expectancy for Burley residents is 84 years for men and 86 years for women, which is well above the West Yorkshire and England averages. Healthy life expectancy is 70 years for men and 71 years for women, which again is well above West Yorkshire and England averages."*

We have seen that the transport networks (particularly rail), and schools are already at capacity, with no plans to address either issue in the foreseeable future (2028 in the WYCA plan, assuming that station infrastructure across the network can accommodate 6 carriage trains). Road and bus connectivity to Bradford and the Aire valley employment centres are very poor. Furthermore, the statement about healthcare is contradictory.

### **Fulfilling housing needs.**

Other areas of the district are yet to fulfil 50% of their allocations, much of which is brownfield, which according to the Local Plan is the priority."

The opposition to the Scalbor development is well-founded based on sustainability, referred to in question 118 and as defined by the NPPF, Section 2. Achieving sustainable development, Paragraphs 7 to 14. There are no exceptional circumstances that could justify the development on this site.

For both BU1/H & BU2/H residents are concerned about the viability of affordable and/or social housing. It has made abundantly clear that Bradford Council are increasing the percentage of affordable homes on Green Belt, from 30% to 40%, but is that change retrospective?

Furthermore, Core Strategy policies H04 and H05, which relate to affordable housing delivery, are subject to an important caveat. This issue first came to light at the Sun Lane Inquiry when reading

the Section 106 Agreement. Bradford Council is continuing to allow house builders/developers to pay an affordable homes contribution (monetary amount) to the Council, instead of ensuring affordable home delivery on a development site. Whilst this is an accepted and legal practice, Burley could end up with zero, or very few, affordable homes delivered. This will further polarise the Burley community as an area haves and have nots, further increasing house prices. Burley is the only area within the Bradford District that has seen a real increase in house prices. This undermines these 2 key housing policies (HO4 and HO5).

## Appendix 1

### Index of documents

- District Housing Allocation.pdf
- Experian job forecast.pdf
- Cambridge econometrics job forecast.pdf
- Bradford SNPP.pdf
- House Prices percentage increase-decrease adjusted for inflation.pdf
- Sun Lane Section 106.pdf