

1. **Introduction - the Holistic View**

Silsden has been subjected to overwhelming housing development in recent years. The community cries out for a pause to traffic blockages, increased pollution and the extensive disruption to local life that comes in the wake of such rapid growth - 20% in the last 10 years. Silsden has 'done its bit'.

Proposed mitigation of the damaging aspects of this expansion completely fails to address the effect on people's lived experience within the existing community. It fails to recognise the cumulative effect of rushed development.

2. **Current Local Plan**

The Council's 18 year old Local Plan is set to be replaced. It was originally timetabled by Bradford's Local Plan Team to be completed by early 2023 and is actually much nearer its completion than its commencement. The draft plan shows significant departures from the obsolete old plan. It provides that in places like Silsden preferred housing sites are more closely defined. The majority of the land included in this application is not identified as a housing site in the new plan.

The case officer's report to this committee says that this new plan can only be given 'limited weight'. We contest this view, firstly because the details of the old plan contrast so strongly with currently accepted standards and expectations, and secondly because of the sheer scale and impact of these differences.

The report is extremely confusing when it comes to discussing the status of land previously safeguarded for housing. Its original purpose was to protect the greenbelt by reserving buffer space for possible future development beyond the timescale of the Local Plan. It was never meant simply to be 'up for grabs'. However the government's now discarded requirement for Councils to demonstrate a five year supply of housing sites, coupled with the attractiveness of green field sites, has encouraged developers to make opportunistic applications such as this. Approval of this application today would rob us of the opportunity to make better choices for Silsden in the near future. There is no clear reasoning in the report as to why this site must be accepted for housing development rather than following the principles of the new plan.

A significant feature in both plans is a protected route for a bypass to the east of Silsden. It was originally envisaged that this would at least in part be funded by housing development in Silsden. That ship sailed long ago because the Council has not observed this principle when granting previous planning permissions. If the Council wishes to adhere to the development plan, then it needs to adhere to all of its principles, and not simply ignore this missing piece of the development jigsaw. No Bypass, no more houses.

3. Housing Numbers

Bradford Council's adopted core strategy retains a requirement of 1,200 new houses for Silsden, more than any other local growth area. The draft Plan recognises that many of these houses have already been built.

The chart before you shows just how much things have been rushed in the past. To left of the green line is the past 10 years. To the right is the period of the new plan. The green block shows the cumulative total contributing to the 1200 target, assuming that current applications of this type were to be approved. If the council continues to grant planning permissions without setting priorities, such as drafted in the new plan, the target would likely be exceeded before the new plan is even approved. I ask, does that make any sense?

Setting priorities is also important if we are to meet real needs of the different parts of the Bradford District. The Council's own consultation recently carried out by Arc4 identifies that proposals such as these do not match these broader needs.

Silsden's designation as a Local Growth Centre is contingent on the proportionate development of local transport links as well as other infrastructure improvements. Rather than these improvements taking place, many provisions have actually been reduced. There is a clear basis for deferring any further large scale housing development until issues such as these are addressed.

In conclusion, this site may be the best available for the applicant, but it is certainly the worst for the community. The Council has previously missed the opportunity to set reasonable criteria to prioritise sites in Silsden. This can be addressed today.

Councillors will be aware that there has been a fundamental change to the proposal at the last minute. If members are not minded simply to refuse the application today then it would be reasonable to expect that the application in it's current form be withdrawn/resubmitted and advertised to allow the legally required consultations process to take place.