

For Office Use only:			
Date			
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Core Strategy Development Plan Document

Regulation 20 of the Town & Country (Local Development) (England) Regulations 2012.

Publication Draft - Representation Form

PART A: PERSONAL DETAILS

** If an agent is appointed, please complete only the Title, Name and Organisation in box 1 below but complete the full contact details of the agent in box 2.*

	1. YOUR DETAILS*	2. AGENT DETAILS (if applicable)
Title	Mr	
First Name	████████	
Last Name	Elsegood	
Job Title <small>(where relevant)</small>		
Organisation <small>(where relevant)</small>		
Address Line 1	████████████████████	
Line 2		
Line 3		
Line 4	Ilkley	
Post Code	LS29 ██████	
Telephone Number	████████████████████	
Email Address	████████████████████	

Signature:	████████████████████	Date:	07 March 2014
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Personal Details & Data Protection Act 1998

Regulation 22 of the Town & Country Planning (Local Development) (England) Regulations 2012 requires all representations received to be submitted to the Secretary of State. By completing this form you are giving your consent to the processing of personal data by the City of Bradford Metropolitan District Council and that any information received by the Council, including personal data may be put into the public domain, including on the Council's website. From the details above for you and your agent (if applicable) the Council will only publish your title, last name, organisation (if relevant) and town name or post code district. Please note that the Council cannot accept any anonymous comments.

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PART B – YOUR REPRESENTATION - Please use a separate sheet for each representation.

3. To which part of the Plan does this representation relate?

Section	2	Paragraph	2.1 & 2.2	Policy	
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4. Do you consider the Plan is:

4 (1). Legally compliant	Yes	?	No	?
4 (2). Sound	Yes		No	*
4 (3). Complies with the Duty to co-operate	Yes		No	*

5. Please give details of why you consider the Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please refer to the guidance note and be as precise as possible.

If you wish to support the legal compliance, soundness of the Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The NPPF does not provide a clear and unambiguous definition of “sustainable” or “sustainability”. That does not, however, give Bradford Council licence to generate its own definition which supports its own contentions.

It is a basic and fundamental element of the NPPF that Green Belt and green space should be protected, and that Green Belt should not be developed other than in “exceptional circumstances”. There are no such exceptional circumstances which apply to the Green Belt around Menston and the Wharfe Valley, as it has not been adequately or convincingly demonstrated that the “housing need” is of the magnitude suggested by the consultants engaged by Bradford MDC.

The conclusions of these consultants are contaminated by the fact that they (GVA) are part of a major development organisation, and have interests in the acquisition and negotiation of land for construction. Thus they have a vested interest in exaggerating the “housing need”, as they are likely to be involved in obtaining the land for such projected development.

Bradford MDC has also instructed consultants (AMEC) to construct and agree a definition of “sustainability”, and to prepare a set of 13 tests by which to judge whether the Plan can be held to promote that “sustainability”. AMEC is one of the UK’s largest infrastructure development companies and can expect to benefit from contracts to facilitate the planned construction. Once again, the evidence is contaminated by vested financial interest. Furthermore, the Council has allocated the task of determining whether these tests of sustainability have been met to AMEC, so that in effect AMEC is judge and jury on its own definition of what is sustainable.

The stated housing requirement for Bradford District is not based on credible and well-researched evidence but has been accepted without critical scrutiny. It is based on a projection underpinned by assumptions and not facts or validated trends. The council says it has “sought independent advice on the level at which the housing requirement should be set” but has commissioned services from organisations which are not independent but which have vested interests and financial stakes in the promotion of house building.

6. Please set out what modification(s) you consider necessary to make the Plan legally compliant or sound, having regard to the test you have identified at question 5 above where this relates to the soundness. (N.B Please note that any non-compliance with the duty to co-operate is incapable of

modification at examination).

You will need to say why this modification will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The base-line for the forecast of housing need (datum) is an interim evaluation by ONS based on the 2001 Census, not a calculation based on the 2011 Census. The population and household estimates for Bradford have been massively influenced by immigration in the period 2001-2010, and are likely to over-estimate. There should be a new forecast made, based on the ACTUAL numbers from the 2011 Census, and this should be prepared by an organisation which is NOT ASSOCIATED WITH A DEVELOPMENT COMPANY OR THEIR AGENTS.

There is new guidance on how to estimate housing requirements in the revision of the NPPF, so finalisation of numbers should take account of that new guidance. It should still be best practice to apply a policy of PDL (brownfield sites) first, before any Green Belt land is 'deleted' or green space consumed.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. Please be as precise as possible.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification to the Plan, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Because Bradford MDC Planning Dept. have shown themselves to be untrustworthy and selective in their reportage and use of data, so they must be made to justify their projections instead of just burying them in mountains of paper and expecting them to be accepted without question.

Please note the Inspector will determine the most appropriate procedure to adopt when considering to hear those who have indicated that they wish to participate at the oral part of the examination.

9. Signature:

Date:

07 March 2014

Core Strategy Development Plan Document (DPD) : Publication Draft

PART C: EQUALITY AND DIVERSITY MONITORING FORM

Bradford Council would like to find out the views of groups in the local community. Please help us to do this by filling in the form below. It will be separated from your representation above and will not be used for any purpose other than monitoring.

Please place an 'X' in the appropriate boxes.

