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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	[REDACTED]	
Last Name	Elsegood	
Job Title <small>(where relevant)</small>		
Organisation <small>(where relevant)</small>		
Address Line 1	[REDACTED]	
Line 2	[REDACTED]	
Line 3	[REDACTED]	
Line 4	Ilkley	
Post Code	LS29 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	

Signature:	[REDACTED]	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	2.10 & 2.11	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.

In producing the Core Strategy, Bradford Council has failed to examine a wide range of complementary or conflicting evidence relating to housing need, flood risk and transport. The Council has in some cases refused to take account of evidence which does not support the conclusions of its own investigations or those of its chosen contractors. Where the Council has a body of evidence, it has frequently chosen to ignore this and outline its proposals in terms which contradict not only the policy (as in the case of the preservation of green space and the provision of allotment facilities) but also run contrary to the findings of the evidence.

For example, in paragraph 5.2.6 the Core Strategy states that “The main routes to the north of the District follow or link Airedale and Wharfedale Many of the key routes in the District are congested at peak times with some also suffering congestion in the off peak periods.” This is an understatement of some significance. At 5.2.9, the Core Strategy then goes on to detail the implications for travel and the transport network, with a growing population and increased housing development. No mention is made of the District-Wide Transport Study produced in October 2010 by Steer Davies Gleave on behalf of Bradford MDC, which is a key element of the relevant evidence base.

That District-Wide Transport Study provided convincing evidence that each new dwelling constructed in Bradford District would generate 8.489 vehicle trips per day, and that the “deficit total” of 28,618 new dwellings would result in 242,944 vehicle trips per day across Bradford District. No information was provided and no plans have been promulgated as to how the existing transport network will be extended or enhanced to accommodate such a massive increase in traffic. The Transport Study also indicated that the A65 linking Leeds and the Yorkshire Dales, through Wharfedale, (“Corridor 7”) was not capable of significant expansion as the road lay in the river valley and was constrained throughout its length by the topography.

In those circumstances it is irresponsible to plan for the construction of more housing than is needed in Wharfedale for the purpose of displacing Bradford’s city centre population into the rural areas. There is further evidence at Section 9.2.1 to the effect that “the use of the road system in Bradford District is dominated by private vehicles. These form some 80% of the vehicles on the road and carry around 70 - 75% of the travelling population.” In the Wharfe Valley, there is little alternative for the working population, and very few employment opportunities exist which would reduce the need for commuting.

The road system in the Wharfe Valley is supplemented in part (between Ilkley and Guiseley, and then between Guiseley and both Leeds and Bradford) by a railway which is, for most of its length, single track. The railway carries much of the commuter traffic because the A65 is simply incapable of carrying any more traffic other than

on the short stretch within the Leeds boundary. There is no dedicated bus lane at any other point along the entire length of the A65. Buses therefore have no advantage over private cars in terms of the daily commute and journey times between Menston and Leeds, or Menston and Bradford, in peak times can exceed 1 hour for the approximately 10 miles distance. Little wonder then that commuters do not and will not travel by bus from locations in the Wharfe Valley. The choice is simply between the use of the private car which offers flexibility in terms of routes and departure/arrival times, or rail, which picks up and returns commuters to a limited number of fixed points from which, unless they reside within walking distance, they will need to take either public or private transport to their eventual destination. This results in parking at railway stations to the full capacity of any of the station car parks, and causes congestion in village streets and adjacent areas by 'overspill' parking related to use of the railway.

Bradford MDC have completed 'edited-out' reference in the Core Strategy to their District-Wide Transport Study. Paragraph 9.2.4 refers to that study in a tangential manner, but chooses only to feature 8 of the 10 corridors which are identified in the Transport Study, ignoring the A65 and the A658 which are the principal roads serving Wharfedale and Leeds/Bradford Airport respectively, and both of which are seriously congested even before further development.

These are examples of selective application of the Evidence Base, even where the studies have been rigorously conducted. Further examples will be provided later, with reference to the specific policies or sections of the Core Strategy, but the point is that this document is NOT SOUND, by reason of much of the evidence base being ignored or, alternatively, selectively applied.

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.

It is essential that Bradford MDC cooperates and collaborates with Leeds City Council on many matters, and there is no evidence to date of such cooperation. Menston has within its curtilage the High Royds development but – as a former hospital site – this came under the control of Leeds. Leeds CC has authorised construction of 600+ dwellings, effectively in Menston, and Bradford MDC are taking no account of the impact of these new dwellings – still only 50% completed/occupied – on Menston and its infrastructure. The developer defaulted on payment of S106 and S278 monies, so Menston has been left with all the problems and no mitigation. In the circumstances, further construction in Menston will simply overwhelm its infrastructure and resources.

The A65 runs through areas controlled by both Leeds and Bradford. Leeds CC has provided evidence that the road is at capacity now, without further development. Bradford MDC has ignored this and other evidence.

There is no spare capacity for parking at Menston station and vehicles are parked on village streets causing congestion. The station at Menston is used by surrounding communities and simply cannot accommodate any more commuters parking in the vicinity. These are problems which will only be exacerbated unless there is a review and cooperation between the two local authorities.

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?

<input type="checkbox"/>	No, I do not wish to participate at the oral examination
<input checked="" type="checkbox"/>	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:

[Redacted 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.

