

For Office Use only:		
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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)
<b>Title</b>	Mr	
<b>First Name</b>	[REDACTED]	
<b>Last Name</b>	Elsegood	
<b>Job Title</b> <small>(where relevant)</small>		
<b>Organisation</b> <small>(where relevant)</small>		
<b>Address Line 1</b>	[REDACTED]	
<b>Line 2</b>	[REDACTED]	
<b>Line 3</b>	[REDACTED]	
<b>Line 4</b>	Ilkley	
<b>Post Code</b>	LS29 [REDACTED]	
<b>Telephone Number</b>	[REDACTED]	
<b>Email Address</b>	[REDACTED]	

<b>Signature:</b>	[REDACTED]	<b>Date:</b>	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	5.4	Paragraph		Policy	EN1
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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.**

This policy purports to make provision for, inter alia, allotments which are said, in addition to providing low cost food, to “provide valuable recreational opportunities involving healthy activity and social contacts. Allotments are significant to our green spaces and provide habitats for many forms of wildlife. ... Today, the council has a statutory requirement to provide allotments for the public. The council manages a total of 38 allotments sites across the district.” The Evidence Base goes on to indicate that “There are 86 sites classified as allotments in Bradford equating to 98 hectares.”

Not a single allotment site is provided in Menston. Allotments in adjacent communities such as Burley-in-Wharfedale and Otley are oversubscribed and have lengthy waiting lists, with an understandable and quite correct policy of preference for the residents of those communities. The Evidence Base admits that “Allotment sites across Bradford District are often oversubscribed.” Yet, the Council proposes development on several of the green fields (pasture land) in and around Menston without making any provision for allotments for the residents of the village, who have clearly demonstrated via the Parish Council that there is a demand for allotments. Bradford MDC has made it clear to Menston Parish Council that it has no future plans for the provision of allotments in Menston, despite the statutory requirement upon it, and Menston Parish Council was not endowed (at its inception) with any land for that purpose.

The provision of allotments would be productive, socially advantageous and would provide continuity of green landscape in and around Menston. Yet the Core Strategy makes no comment nor indicates any future provision, but sets out proposals for construction on the pasture land which could provide the allotments and recreational facilities Menston lacks. By contrast, the Evidence Bases states that “the urban areas surrounding the city centre is adequately provided for in terms of amenity space.” It seems perverse therefore that the city centre provides amenity space and has numerous derelict sites already allocated to the provision of housing (on Brownfield sites/previously developed land, PDL) yet the core strategy makes no provision for allotments or amenity space in Menston and other rural communities where there is no scope for additional housing without the consumption of valuable green space. In these respects and in relation to policy EN 1, the core strategy is NOT SOUND.

**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.

Bradford MDC should be obliged, before any more green land is allocated for housing, to demonstrate how it will meet its statutory obligation to provide allotments and amenity space in Menston. More housing ought to mean an increase in allotment provision, but there is none now and none planned. If the green fields are consumed by housing, there will be no scope for the provision of allotments or amenity space for current and/or future residents which will be a breach of the Council's statutory obligations and make a mockery of Policy EN1.

*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. They must be made to answer to an Inspector and audience how and when they will rectify the deficit in allotment provision and amenity space for Menston.

*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.

