

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)
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	5.3	Paragraph		Policy	HO1
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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.

Bradford MDC has failed to prioritise or enforce construction on the available Brownfield sites over many years. The Council has a legacy of some 13,000 existing properties which await refurbishment or redevelopment, most of which are empty and progressing towards dereliction. The Council also has given planning permission for some 16,000 new dwellings on PDL but has not obliged the prospective developer to progress the construction. Those sites are simply being land-banked until the developer deems them sufficiently profitable, whereupon they will be considered 'viable'. Bradford MDC has permitted developers to determine what is 'viable' by reference to their own profit expectations, and not to any criteria of need for the City, the population or the state of the existing housing stock. Therefore, within Bradford District there is already scope for the construction of 50% of its projected target of housing without the confiscation of any Green Belt or green field land, even if that huge housing target was sufficiently and independently validated.

By ignoring this massive number of inner city sites it is inevitable that, by adopting a target for housebuilding in excess of 42,100 (for which there is no independent or validated evidence of need or of demand), Bradford MDC will show a deficit in its schedule of construction and in its 5-year Housing Supply. This deficit is entirely artificial, based only on assumptions and hypotheses typically produced by consultancy organisations related to or subsidiaries of house-building or infrastructure development organisations.

Furthermore, the evidence base at Section 8.2 clearly reveals that there is no significant or large employer in areas to the north of Bradford including the Wharfe Valley. The Councils own maps show that there is not one of the top 30 employers in Bradford District located in Wharfedale. All the employment is concentrated in and around the City Centre or to the south of Bradford, close to motorway and haulage routes. It is there that housing construction would have the most impact upon regeneration and the population which needs housing or better housing. By ignoring the facts and concluding that housing should be constructed on the very landscapes which characterise these Yorkshire valleys, Bradford MDC is in danger of defeating the objectives of inner-City regeneration and increasing the need for commuter travel, with the attendant consequences of air pollution, increased consumption of energy, extended journey-times and related stress, and the reduction by development of the desirability (for both residents and tourists) of the village communities in the Wharfe and Aire Valleys.

The proposals for the location of housing in the Core Strategy are based on a failure of logical reasoning, and a failure to appreciate that construction in the rural areas will necessitate that aspiring property-owners will also own cars and commute if they are to find employment, meet the associated costs from their disposable income, and they will not contribute as much to the economic regeneration of the City or the District as if they were provided with quality homes closer to employment.

Commuter traffic on all the roads (A65, A658 – which also access the airport – and the A6038) mean that a journey to Leeds or Bradford in peak hours (now a 2-hour period morning and evening) can take more than an hour for only 10 miles. There are no bus-lanes on these routes except within the Leeds City boundary to get bus traffic through any more quickly than car traffic, so why would anyone travel by bus? The only alternative to the car is the railway along the Wharfedale Line, which has capacity limitations, not just as regards the trains and carriages, but as regards platform access and signalling at Leeds, the single-line working for most of its length and the fact that the platforms at intermediate stations cannot be lengthened. All the rail stations in the communities on the Wharfedale Line pull in commuters (by car to the rail stations) overwhelming villages like Menston with the parked cars of people from Otley, Poll and other communities.

Industry and commerce will not come to Wharfedale because of the limitations of topography and poor access to motorway networks and trunk routes, so it is folly to imagine employment being created in the Wharfe Valley in any volume sufficient to absorb an increase in population. The population must, logically, be located close to where work is available.

The Core Strategy is therefore inconsistent with the stated Policy HO1, as it is with Policy EN2, insofar as the effects of implementing that strategy would fail to prioritise economic regeneration of Bradford and would include adverse effects upon the environment and the social condition of residents displaced from employment readily accessible from their accommodation.

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 Council needs to take account of the locations of accessible employment in Bradford District and then recognise that they are not in the Wharfe Valley. Construction in the Wharfe Valley and particularly in Menston will only add to the already heavy commuter traffic into Leeds or Bradford, which is already beyond the capacity of the A65, A658 and A6038 at peak times. To increase road traffic by building in Wharfedale will conflict with its environmental policies.

Furthermore, as the rail service takes commuters from communities surrounding a station but which do not have a rail station of their own (eg. Pool, Otley, Arthington and Bramhope), BMDC must be obliged to review their Plan and take proper account of the parking problems in communities with a station, and the fact that platforms cannot be lengthened nor the capacity of trains increased to take more commuters at peak times. Leeds City Station has no more signalling or platform capacity to take an increase number or frequency of trains. Overcrowding is already chronic on the Wharfedale Line and an increase in residents will mean yet more commuters.

The issue of commuting to work has not been seriously considered. Wharfedale has lost most of its local employment because of the absence of adequate road transport links to the motorways to the south and east of the Leeds/Bradford conurbation and it is fanciful to believe this can be reversed. Re-think needed.

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?

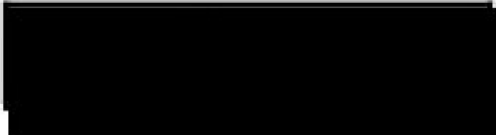
<input type="checkbox"/>	No, I do not wish to participate at the oral examination
<input checked="" type="checkbox"/>	Yes, I wish to participate at the oral examination

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. They have thus far failed to require or insist upon developers completing on the brownfield sites already allocated, and there is a danger this will happen again, causing them to shortfall on the 5-year housing supply and – once again – go looking for Green Belt and green fields to compensate. They must be held to account for permitting this situation to arise and allowing developers to 'bank' land.

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.

