

## Core Strategy Development Plan Document

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

### Publication Draft - Representation Form

Monday 17<sup>th</sup> February until Monday 31<sup>st</sup> March 2014

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This is your opportunity to comment on the Core Strategy Publication Draft document. The Council would like to hear your views on the 'soundness' of the Plan, legal compliance of the Plan and on the duty to co-operate.

You can access the Core Strategy documents online and additional copies of this form from our website:  
[www.bradford.gov.uk/ldf](http://www.bradford.gov.uk/ldf).

For further information you can contact the Local Plan Group by:

- Emailing us at: [ldf.consultation@bradford.gov.uk](mailto:ldf.consultation@bradford.gov.uk)
- Phoning us on: (01274) 433679

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Please make your representation on this official form that has been specifically designed to assist you in making your representation to cover the matters the Inspector will consider in the report on the plan. A copy of this form will be provided to the Inspector.

This form has three parts:

- **Part A** – Personal Details
- **Part B** – Your Representation(s). *Please fill in a separate sheet for each representation you wish to make.*
- **Part C** – Equality and diversity monitoring form

The Council has produced a separate **guidance note** to assist you in making your representation. This contains detailed information on legal compliance, the duty to co-operate and on soundness. You are strongly encouraged to read to this information to make the fullest use of this opportunity.

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Please return this completed representation form to the Local Plan Group by either:

- **E-mail to:** [ldf.consultation@bradford.gov.uk](mailto:ldf.consultation@bradford.gov.uk)
- **Post to:** Local Plan Group, City of Bradford Metropolitan District Council,  
2<sup>nd</sup> Floor South, Jacobs Well, Nelson Street, Bradford, BD1 5RW

**For your representation to be 'duly made' the Council must  
receive it no later than 5pm on Monday 31<sup>st</sup> March 2014**

For Office Use only:			
Date			
Ref			

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#### 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		Thomas
Job Title (where relevant)		[REDACTED]
Organisation (where relevant)	McCarthy & Stone Retirement Lifestyles Ltd.	The Planning Bureau Ltd
Address Line 1	[REDACTED]	[REDACTED]
Line 2	[REDACTED]	[REDACTED]
Line 3	Bournemouth	Bournemouth
Line 4	[REDACTED]	[REDACTED]
Post Code	BH8 [REDACTED]	BH8 [REDACTED]
Telephone Number		[REDACTED]
Email Address		[REDACTED]
Signature:	[REDACTED]	Date: 21/03/2014

#### 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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Date			
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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	<input type="text"/>	Paragraph	<input type="text"/>	Policy	<b>H08</b>
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**4. Do you consider the Plan is:**

4 (1). Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4 (2). Sound	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4 (3). Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

**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.**

Thank you for the opportunity to comment on the consultation papers for the aforementioned document. As the market leader in the provision of sheltered housing for sale to the elderly, McCarthy and Stone Retirement Lifestyles Ltd considers that with its extensive experience in providing development of this nature it is well placed to provide informed comments on the Bradford Core Strategy, insofar as it affects or relates to housing for the elderly.

**The Need for Specialist Accommodation for the Elderly**

The National Planning Framework stipulates that the planning system should be *'supporting strong, vibrant and healthy communities'* and highlights the need to *'deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive mixed communities. Local Planning Authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different housing groups in the community.... such as..... older people'*.

In line with the rest of the country, this toolkit demonstrates that the demographic profile of Bradford is projected to age with the proportion of the population aged 60 and over is set to increase from 18.3% to 21.3% between 2008 and 2033. The largest proportional increase in the older population is expected to be of the 'frail' elderly, those aged 75 and over, who are more likely to require specialist care and accommodation.

In light of the above, there is a considerable challenge to the Council to provide the necessary quantity of housing to accommodate the needs of an ageing population. This trend will have a considerable impact on housing demands which, if not properly planned for, will have negative consequences for the City of Bradford

Private sheltered accommodation, such as those provided by McCarthy and Stone should have a key role to play in meeting the needs of an ageing population and can alleviate many of the challenges facing the Council in providing sufficient quantities of accommodation.

We therefore commend the Council for taking a positive approach in seeking to provide appropriate accommodation to meet the needs of its ageing population within *Policy HO8: Housing Mix*, specifically bullet point 6).

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.

As previously stated, McCarthy and Stone commend the positive approach in seeking to provide appropriate accommodation for the elderly as detailed in sub-clause 6) of Policy HO8: Housing Mix.

We do however feel that the wording of sub-clause 6) could be improved to read more positively with the substitution of the word 'greatest' with 'sufficient' so as to simply read:

***'Supporting the provision of specialist accommodation for older people in suitable locations and in areas of sufficient demand'.***

***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:**

**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:**

21.03.2014

## 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.**

