



|                      |  |  |  |
|----------------------|--|--|--|
| For Office Use only: |  |  |  |
| Date                 |  |  |  |
| Ref                  |  |  |  |

## 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                            | Dr               |                                  |
| First Name                       | [REDACTED]       |                                  |
| Last Name                        | Ellams           |                                  |
| Job Title<br>(where relevant)    |                  |                                  |
| Organisation<br>(where relevant) | [REDACTED]       |                                  |
| Address Line 1                   | [REDACTED]       |                                  |
| Line 2                           | [REDACTED]       |                                  |
| Line 3                           | Menston          |                                  |
| Line 4                           | [REDACTED]       |                                  |
| Post Code                        | LS29 [REDACTED]  |                                  |
| Telephone Number                 | [REDACTED]       |                                  |
| Email Address                    | [REDACTED]       |                                  |
| Signature:                       | [REDACTED]       | Date: 23 March 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.

| For Office Use only: |  |  |  |
|----------------------|--|--|--|
| Date                 |  |  |  |
| Ref                  |  |  |  |

**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 | Policy | NPPF |
|---------|---|-----------|-----|--------|------|

**4. Do you consider the Plan is:**

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

**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.**

It is our opinion that the NPPF does not provide a clear and unambiguous definition of sustainability. Bradford Council through GVA Grimley have in effect made up their own definition of 'sustainability'. There is currently much dialogue between local councils, the planning minister (Nick Boles) and the planning inspectorate as to what should or should not be developed except in exceptional circumstances. The greenbelt should be protected and yet we know large swathes of green space in and around the Wharfe Valley is designated as available for housing.

We challenge Bradford's evidence base on sustainability issues in that GVA Grimley and AMEC must both have a vested interest in pursuing housing in the Bradford district and thereby have a conflict of interest. It is our belief that the housing requirement for the Bradford district is not based on well researched material and has been accepted without critical appraisal. Many projections have been used and even though the council says it has sought independent advice on the level at which the housing requirement should be set, most of this has come from sources which may be regarded as suspect in terms of impartiality.

The draft core strategy publication by AMEC, page 1 paragraph 2, gives a vision for Bradford which sounds like we are all going to live in Utopia!!

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 a community we feel Bradford has failed to examine a wide range of complimentary or conflicting evidence relating to housing need and in some cases such as transport, contradicted some of its' own investigations.

If any of the evidence is contrary to the proposals this has been ignored and an example of this would be the A65 trunk road appraisal which has almost been airbrushed out from the core strategy.

Wharfedale and Airedale Review Development (WARD) commissioned an A65 appraisal in 2011 which clearly demonstrated the road was now at capacity.

We would wish to point out that very little evidence of duty to co-operate between Leeds and Bradford councils appears regarding the congestion on the A65 and thus we feel that part of the sustainability appraisal on transport in the Wharfe Valley is not sound.

Bradford's district wide transport study of October 2010 highlights the extra number of vehicle trips per day and without taking this into account we feel that with an additional 1600 houses as part of the core strategy designated for the Wharfe Valley and without including the housing allocation for Aireborough (Leeds council) the A65 becomes pivotal to movements between Leeds or Bradford to the Yorkshire Dales and Lake District.

This is completely at odds to the core tourism strategy for the area.

*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:

As chairman of Menston Community Association I represent a large number of senior citizens who would not be able to represent themselves and have few ways of gaining experience in planning matters to voice their opinions.

*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:

23/03/2014

## 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.**

