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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	Mrs	
First Name	[REDACTED]	
Last Name	Hanson	
Job Title (where relevant)	[REDACTED]	
Organisation (where relevant)	Menston Parish Council	
Address Line 1	[REDACTED]	
Line 2	Bingley	
Line 3	[REDACTED]	
Line 4		
Post Code	BD16 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	[REDACTED]	Date: 26 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.

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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	<b>Section 5.1</b>	Paragraph	<b>1<sup>st</sup> Para</b>	Policy	<b>EC2</b>
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**4. Do you consider the Plan is:**

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

The Council plan Policy EC2 to produce over 46k of new jobs in the 16yrs to 2030 is seemingly based on need see para 5.1.14 and not on solid robust evidence supported by independent analysis. Unless this figure can be properly defended as realistic the whole Core Strategy is undermined. The Council will need no reminding that the Taylor Review of December 2012 recommended that there should be a closer link between the SHMA and Employment.

**Even the last argued case for employment growth of 27k jobs for the 14 years to 2028 we considered in an earlier submission was optimistic.** This was because it failed to properly account for the sharp reduction in jobs in the previous three years and the likelihood that Bradford must anticipate further serious job losses certainly up to 2018 as Government cuts really start to take effect.. We also argued that the a significant proportion of jobs were expected to be in the retail trade and other low paid employment in hotels, catering and most likely a material proportion of the expected growth in health and business services. Thus even if this job total was met it would probably translate into, on optimistic assumptions, only 17k of new dwellings being economically affordable in the District. If the Council want to more than double this number it will have to be predominately social housing which in the current economic climate is unlikely to be supported by the necessary funding.

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.

We conclude that the employment requirement of 2897 new jobs pa until 2030 requires reference to well researched evidence in one of the paragraphs supporting Policy EC2 which clearly confirms this job creation objective is both credible and achievable.

*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:

To clarify publicly how Bradford justify their employment growth figures

*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:	26 March 2014