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

Core Strategy Development Plan Document

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

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 | Councillor | |
| First Name | [REDACTED] | |
| Last Name | Smith | |
| Job Title <small>(where relevant)</small> | - | |
| Organisation <small>(where relevant)</small> | - | |
| Address Line 1 | [REDACTED] | |
| Line 2 | [REDACTED] | |
| Line 3 | Ilkley | |
| Line 4 | [REDACTED] | |
| Post Code | LS29 | |
| Telephone Number | [REDACTED] | |
| Email Address | [REDACTED] | |
| Signature: | [REDACTED] | Date: 30th 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 | 5.3 | Paragraph | B | Policy | HO11 |
|---------|-----|-----------|---|--------|------|

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.

I welcome the building of Affordable Housing to meet local needs of the area.

However the Affordable Housing Policy HO11 is not sound in so much that it does not stress actual local areas of housing need but rather the financial contribution to provide for the district's need. The confusion of these two objectives means that new Affordable Housing will go not where it is needed but where it can be best funded, ie Wharfedale.

The implication of these contradictions is twofold:

1. Unless Affordable Housing is in balance with local need the policy will entice people into Wharfedale with no family, no work and no other connection. The consequence is that these residents will be heavily subsidised to live in an area many miles from their employment opportunities, families or adequate social facilities.

2. Unless these residents travel to work by the ever increasing cost of trains, (in Wharfedale fewer than 20% of the working age population travel to work by train), they will be forced to use carbon unfriendly cars on already over congested roads. Congestion on the A65 to Leeds and A6038 through Shipley to Bradford is already well documented.

The discounts proposed in the current Core Strategy to make houses locally affordable are not disclosed but in the 2012 LDF core Strategy it was between 40%/50%. Even then the cost of rent or equity purchase would be comfortably in excess of the market prices elsewhere in the District. Thus if there is not a clearly defined local need Bradford Council will be using critical funding to move other District residents to Wharfedale with at best no financial benefit to the incoming residents.

Possible Solution:

In the Menston area with already 200 affordable dwellings committed in the adjacent Leeds development at High Royds and some needs met by earlier developments in Menston a 30% or over 120 extra houses for Menston in the current proposals is well in excess of local requirements.

To put sense into this conundrum look at Para B: the use of off-site provision or financial contribution.

Bradford Council's own research confirms Menston and indeed much of Wharfedale (including Burley) would be overprovided by affordable houses.

If Para B is applied then the excess would be translated into affordable dwellings or funding elsewhere in the District.

The funds released for each un-required dwelling in Wharfedale will be up to twice that elsewhere in the District.

Bradford District will benefit from having up to twice as many such dwellings being built in areas of actual need and sustainability, giving a win win situation for everyone.

- 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.

Policy HO11 and in particular para's B on page 155 needs rewording to reflect the essential point that the presumption is that new developments need to contribute to robustly evidenced local need and surplus requirements to Affordable Housing Targets used to fund similar housing elsewhere in the District.

(More pointedly the presumption that Affordable housing requirement is driven by the Economic Viability Assessments should be turned on its head!).

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 ensure that a local, democratically elected voice is heard.

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: | 30 th 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.

