

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 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	[REDACTED]	Date: 29th 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	3	Paragraph		Policy	SC1
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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.

The Core Strategy in Section 3 lays out the vision to improve the District's infrastructure covering transport, education or local community facilities but any detailed plans and funding proposals are conspicuously absent from the Core Strategy Section 3 or elsewhere.

Without such a budget to underpin the infrastructure improvement budget it is doubtful that the Core Strategy will be deliverable.

An exception to the explanation as to how it may be delivered is Affordable Housing where funding is defined by a required percentage of Affordable Housing in each development funded by the developers. Whilst this may result in the targets being met there may be a cost elsewhere in the funding of infrastructure because where other costs are negotiable i.e. S106 and S278 contributions they will be minimised by the developers to maintain the viability of their operations and meet their commitments to fund the required Affordable Housing. There is will lead to a serious distortion and imbalance in the way developers fund other infrastructure projects with at the very least adverse consequences for local communities.

To put this in the **context** of Menston developers at Derry Hill and Bingley Road are likely to pay of the order of £10 for funding Affordable Housing for every £1 on sec 106 and 278 actions. Arguably this is an imbalance towards the interests of those requiring Affordable Housing against the arising infrastructure improvements needed in Menston following these developments. This shows that partial firm funding commitment has the real potential to result in severe imbalance of the total available funding against the total sum of the needs of the District as defined in the Core Strategy.

Similar arguments apply to the village of Burley-in-Wharfedale where requirements and improvements with regard to local infrastructure are equally valid and where they suffer similar stress and strains.

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 Core Strategy, proposal in Section 3 Policy SC1 needs to include a business case to underpin its infrastructure improvement objectives in the broadest of terms with weighting to reflect the priorities of the Council.

Such a business case needs translating into the clearest financial guidelines for all the funding parties including developers.

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: [REDACTED] Date: 29th 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.

