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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	Mr	Mr
First Name	[REDACTED]	[REDACTED]
Last Name	Tunbridge	Wood
Job Title (where relevant)	[REDACTED]	[REDACTED]
Organisation (where relevant)	Yorkshire Greenspace Alliance	CPRE West Yorkshire
Address Line 1		[REDACTED]
Line 2		[REDACTED]
Line 3		Sheffield
Line 4		
Post Code		S10 [REDACTED]
Telephone Number		
Email Address		[REDACTED]
Signature:	[REDACTED]	Date: [REDACTED]

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	<input type="text"/>	Paragraph	<input type="text"/>	Policy	Policy HO11
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4. Do you consider the Plan is:

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

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.

Setting 'upto' targets for the policy are meaningless, because any rate of affordable housing delivery from zero upwards could be considered to comply. This problem is made worse more so by the 'subject to viability' clause. The ongoing shortfall in provision of affordable housing nationally and locally is a major failure of public policy, and HO11 is powerless to address that failure. It is therefore impossible to see how the 20-25% district-wide target is to be achieved. The policy will be ineffective and should therefore be considered unsound.

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.

'Up to' targets in HO11(B) should be replaced with 'at least'.

The let-out clause 'subject to viability' in HO11(B) should be deleted, and replaced by a statement along the lines that 'Provision of affordable housing at less than the target rate will only be permitted in exceptional circumstances where a development proposal otherwise considered to offer excellent contribution to sustainable development would be compromised by the financial implications of meeting the target.'

HO11(E) should be reworded to reflect our suggested amendment to HO11(B).

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 further represent the views and concerns of the Yorkshire Greenspace Alliance in the light of all parties' consultation responses and the questions posed by the Inspector.

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:	<input type="text"/>	Date:	<input type="text" value="26 March 2014"/>
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