

PART B – YOUR REPRESENTATION - Please use a separate sheet for each representation.

3. To which part of the Plan does this representation relate?

Section	Section 3	Paragraph	New Para Required	Policy	SC1
---------	------------------	-----------	--------------------------	--------	------------

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	X
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 Core Strategy in Section 3 lays out the vision to improve the District’s infrastructure whether transport, education or local community facilities. **To be credible it must have a business case.** That is a well considered Statement on at least the broad anticipated costs of these improvements and the necessary sources of Funding. This is however conspicuously absent from the Core Strategy Section 3 or elsewhere.

Without a budget to underpin the infrastructure improvement budget there can be no confidence that the Core Strategy is deliverable. There is one exception to this serious criticism of the Core Strategy and that is Affordable Housing which in itself highlights another problem.

Funding in this case is defined by a required % of Affordable Housing in each development funded by the developers. As a result there is a better than even chance that the Affordable Housing objectives of the District will be met.

However there may be a cost elsewhere in the funding of infrastructure. 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 therefore a real risk there will be 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 into **a local context** in 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. Whether this is the case or not is not important. What this local instance does however illustrate, however, is that partial firm funding commitments 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.

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 must include a business case to underpin its infrastructure improvement objectives, be it in broad terms, and given appropriate weighting to reflect the priorities of the Council. These commitments then need translating into clear 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?

	No, I do not wish to participate at the oral examination
Yes	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:

Bradford Council has not demonstrated the need for a financial basis for its Vision Objectives. The Parish Council is prepared to discuss the arguments justifying our assertion.

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:	Catriona Hanson	Date:	26 March 2014
	Parish Clerk		