

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	

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.

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

We consider however that the Affordable Housing Policy HO11 is not sound in so much that it does not stress actual local areas of need but rather the financial contribution to provide for the district's need. The result is this policy, as drafted, confuses these two objectives. That is new Affordable Housing is likely to go not where it is needed but where it can be best funded, ie Wharfedale.

What are the Implications of this confusion

A. This Policy unless in balance with local need will inevitably, and probably unsustainably, entice people out of Bradford, or elsewhere who have no family, no work or no other connection in or with Menston or more generally within Wharfedale. The consequence is that these residents will be heavily subsidised to live on an estate many miles from their employment, families or adequate social facilities. This involves further cost and time sacrifices, for such residents, which **has no sense or sustainability merit.**

B. Further 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.

C. We have not seen the discounts proposed in the current Core Strategy to make houses locally affordable 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 themselves.**
Possible Solution

In Menston 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 is arguably well in excess of local requirements. To put sense into this conundrum we must pick up another point made in Para B the use of off-site provision or financial contribution. To develop this argument in a local context if Bradford Council through their own research's confirmed Menston and indeed much of Wharfedale would be overprovided by affordable houses if Para B is applied then the excess could be translated into affordable dwellings or funding elsewhere in the District. As the funds released for each un-required dwelling in Wharfedale may be up to twice that elsewhere in the District, **Bradford District would benefit from having up to twice as many such dwellings being built in areas of actual need and sustainability, a win win situation.**

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. That is the present presumption the 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?

	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:

We can bring local knowledge to support our arguments

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		