

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	D	Policy	HO11
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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	

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 are concerned that the Council's preferred tenure mix, of 70:30 social/affordable rent: intermediate, Para 5.3.175, has no drafted guidelines on the criteria which would influence the flexibility to the proposed tenure. This is definitely needed to ensure local housing demands are met with more certainty than currently the case.

In Menston, which may well be typical for the whole of Wharfedale, house ownership including those on mortgage is 85% (2011 census) while in Bradford as a whole it is 60%. Consequently the likelihood is that local residents will be more inclined to purchase, be it on a part equity basis, than rent not only because that is the norm in the locality but also because they are more likely to be employed (only 1.6 unemployed in Menston in 2011 unlike Bradford district 5.8%) and earning higher wages than elsewhere in the District.

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.

This statement in para 5.3.175 of one size fits all should be redrafted to recognise more definitively that different presumptive ratios may be appropriate based on local housing and employment circumstances together with some indicative guidelines supporting how these changes may be justified. Without such redrafting the flexible presumptions in Para D are undermined by the content of para 5.3.175

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:	Catrina Hanson	Date:	26 March 2014
	Parish Clerk		