

Further statement (1) per Addingham Civic Society rep 111

From: Peter Wilkinson
Sent: 20 February 2015 17:23
To: Tony Blackburn
Subject: The soundness of the Bradford Local Plan

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Dear Mr Blackburn

I am a resident of Addingham, I participated in the work done by members of Addingham Civic Society and others to produce a response to the Consultation Draft. Since then, I have been involved with other groups in Wharfedale and elsewhere observing developments in the process. Many of the representations from Addingham and other communities raised numerous questions regarding the quality and validity of the data used to inform the Plan. These concerns were raised with District Councillors resulting in a decision by the full Council on 10 July 2012 as follows

Decision list of Full Council from the meeting held on 10 July 2012.

Resolved - The Local Development Framework is critical to meeting the future needs of the Bradford District. The LDF needs to be based on the most accurate and valid data available. This Council, therefore, instructs the Chief Executive to obtain external confirmation as to the accuracy and applicability of data used to inform the LDF both demographic and economic and that the report should be taken to the Executive at the appropriate stage of the LDF process.

In recent weeks we have been seeking access to the report, we have been informed by officers of

Report of the Assistant Director (Planning, Transportation & Highways) to the meeting of Executive to be held on 19th November 2013. Housing Requirement Study 2.27

"Following revocation of RSS, and in line with the NPPF, the Council commissioned consultants GVA to carry out a study to establish the districts objectively assessed need for housing. GVA have proven experience in this field and have undertaken similar studies for a number of other Local Authorities including Leeds and Calderdale. This study also fulfils the Councils resolution of 10 of July 2012, which sought external verification of the demographic basis for housing targets within the plan."

This reply raises serious concerns, we now understand that Bradford Council commissioned the report from consultants who were actively engaged on behalf of developers in the district. The report of the Assistant Director records a complete contradiction of the spirit, intent and detail of the Council's

instruction to the Chief Executive. Certainly the specific requirements for external confirmation of the data has not been met, The instruction required that both the demographic and economic data should be examined and confirmed for accuracy and applicability. The instruction did not constrain the examination to the single issue of "the need for Housing" . The instruction also required that the report should be taken to the Executive at the appropriate stage.

Since the publication of the draft LDF we have become aware that Leeds Council Scrutiny Committee carried out an exhaustive examination of the work of both GVA and Edge Analytics on similar studies. The report (attached), published in October 2011, identified numerous criticisms of the work.

We are aware of the proceedings of the DCLG Select Committee in its examination of the Operation of the National Planning Policy Framework. The Parliamentary record displays evidence which challenges much of the process, methodology data and analyses supporting the Bradford Local Plan, including the GVA ?Edge Analytics work. This raises questions about the effectiveness of the Quality Management processes required in Bradford's contractual arrangements with Consultants.

It is clear that during the later months of the Bradford Plan production process there was a growing bundle of evidence that independent scrutiny, audit and analysis of a number of elements of was required. We have written to the Bradford Scrutiny Committee Regeneration asking for an account of its role in the local plan preparation, we have not received a reply.

We note that the Regeneration and Economic Overview and Scrutiny Committee is chaired by a member of the ruling party. This appointment contravenes the guidance on Overview and Scrutiny in Local Government Standard Notes SN/PC/06520. It also contradicts New Council Constitutions Guidance to English Local Authorities 2006 -- paragraph 3.

In the last few hours resident groups have identified contradictions in information given to the public and to Councillors about the Housing numbers in the plan. Throughout, the whole process it has proved difficult to focus solely on the data and analysis which has been put forward in support of the plan, political undertones have been apparent. The ruling party portfolio holder for Planning, Councillor Slater is reported to have advised that the final plan, which was presented for Examination, did not include any changes to housing numbers. We have been puzzled by the apparent absence of a Full Council examination the Plan submitted.

Our understanding of the requirements of the NPPF is that the process requires, amongst other things, a valid, functioning process of scrutiny. It is now apparent that the failure to comply with the instruction of 10 July 2012, combined with the apparent contradictions of the process required by the NPPF justifies independent examination. Until these activities are audited independently the data and results emerging cannot be accepted as reliable.

I request an opportunity to speak to this statement during the Examination

Regards

Peter Wilkinson

<housing final report final 24-10-11 (2).pdf>