



WILSDEN PARISH COUNCIL

The Village Hall,

BD15 [REDACTED].

West Yorkshire.

3rd February 2016

CIL Consultation response

Wilsden Parish Council supports the adoption of CIL by BMDC as the means of managing developer contributions to infrastructure but we do not support aspects of the Preliminary Draft Charging Schedule. While we support the proposal to levy CIL by means of variable tariffs the way the Residential Charging Zone boundaries have been drawn has not achieved the appropriate balance between the desirability of funding infrastructure and the viability of development.

The main independent report prepared by DTZ on behalf of BMDC acknowledges in the conclusions section that "The recommendations are intended as a guide, but small variations could be justified" (p.8). Wilsden Parish Council is seeking such a small variation. There is compelling evidence to do so, especially as it will support the key principle of achieving a 'balance' between the infrastructure funding need and viability. Charging zone 3 is very diverse and includes more affluent areas as well as less affluent areas. The area wide model adopted masks these variations, and underplays the scope and justification to introduce a higher charging rate in some parts of the charging zone, such as Wilsden. Such an approach would, if introduced, further support the viability and delivery of development.

The overall methodology used in the Viability Assessment by DTZ to calculate the level of CIL appears to be soundly based although we question the validity of some of the baseline data used to reach the conclusions. We submit that the primary reason why the Charging Zone boundaries are incorrect is a result of flawed assumptions from the residential value areas in section 4.1 of the Viability Assessment. The use of average house price bands assumes that the future housing mix will be directly related to the historic housing mix. This is based upon a complete misunderstanding of the housing mix in many parts of the district. In villages such as Harden and Wilsden there is a much higher proportion of older terrace properties that have a significantly lower prices than the new properties that have been built in recent years. This is confirmed by Council Tax band data for Wilsden detailed below.

In October 2015 there were 2,101 properties liable for Council Tax in the Wilsden Parish Council area and the breakdown by percent in each band is shown below. In the previous five years an additional 142 properties have become eligible for Council Tax. The proportionate Council Tax bands for these 142 properties are also shown below illustrating that recent development is significantly different to the historic profile of houses in the area.

Council Tax band	Total properties in Wilsden	Properties built in the previous 5 years
Band A	14%	15%
Band B	17%	8%
Band C	36%	10%
Band D	12%	21%
Band E	11%	23%
Band F	7%	19%
Band G & H	3%	4%

It can be seen that 67% of the properties built in the last 5 years are in Band D or higher compared with only 33% of the total properties in Wilsden being in Band D and above.

In summary we submit that the Residential Charging Zone boundary proposals are flawed and that villages such as Harden and Wilsden should be subject to a substantially higher rate of CIL than is proposed. Such villages should be as a minimum in Zone 2. We believe the way that the Viability Assessment gathers evidence to support this premise, by stating that a current development typical of the type of houses built in recent years can sustain a CIL level significantly above £50, and then proposes that these villages are in Zone 3 is perverse. We have particularly concentrated upon the village of Wilsden in our submission because this is the area we know well and where we have access to detailed evidence. If the Charging Zone boundaries are not completely reviewed and refined the developer contributions towards infrastructure, both district wide and to individual communities, will be dramatically reduced to the detriment of everyone.