

This proposal seems based on the Bedford proposal which is in the better areas of the Country which have a larger CIL possible where the increase in value of projects will subsidise the areas in their Towns and cities. The percentages' proposed by Bradford are 25% to Town and Villages Councils and 75% to overall support for infrastructure costs into Bradford with no possibility of a fair proportion returning to the outer areas is disingenuous to Bradford's large outer area. The CIL charges are £100 per sq m in the outer areas of Wharfedale, this will ensure those areas residents consider removing themselves from Bradford's control as suggested by the 2 MP's in these areas therefore a significant loss to Bradford's CIL .

The Document proposed is based on the Core strategy document proposals of 42K new homes by 2030, but these are not agreed and the documents are flawed, so the assessment of the amount to contribute to the future council budgets on this basis is wrong and will be lower than expected. Deciding the CIL before even the local plans are completed is crass also running the CIL with the S106 is double trouble for all concerned. It is noted that over the 11 years previous there have been only 1500 p a new home ratings so how does this equate to the need for 42,000 over the next 15 years – another flaw in the proposal

DTZ document is impressive yet there is no consideration of the residents having this cost past onto them in the purchase price. Their suggestion of 36% of the new homes would be in the greenbelt goes contra to Government policy.

With reference to the Core Strategy it is clear that Council have no idea of what Brownfield land industry and housing land grant system recently announced by the Government will achieve in the number of extra homes possible under this grant system in our Towns which would offset homes proposed in the green belt. Government says Brownfield sites first hence the Government Grant system to bring these sites into use and save our greenbelt lands and communities.

Also we also need to reuse the homes which were over shops back into affordable homes, get un occupied homes back into use and increase the use of Brownfield sites beyond those in the Core strategy. Bradford have no information on the number of lock up shops with unused accommodation on the upper floors and bring them up to Decent home standards. This will also effectively reduce the number houses on any green belt land and give homes where the main workload is required, in the towns. The Council confirms they have no idea what could be achieved by reusing homes over shops and therefore the process of CIL and The Core Strategy are flawed.

Council officers are not being proactive in seeking Inspectors views on these new issues and helping to reduce the number of homes in the green field areas. This is all set against the lower population increases stated in a recent document. Labour control of the council have clearly no idea of outer district community structure and are only interested in taking money from them.

The CIL will not work as proposed by Bradford to subsidise the council budget due to the failure to agree a Core strategy. This needs fully reassessing after the Brownfield grants and homes over the shops and the density issues of the proposed houses where the incorporation of SUDS will on some sites require space for the installation of hard surface drainage returning into ground not into drains thus reducing the number of homes on that site and SUDS will help slow down ground water run off and prevent Flooding. Recent Flooding should ensure the housing in the flood plains are reassessed.

I am very appreciative of the Governments review of the CIL draft proposals by Councils especially by an independent inspector. I also expect the proposals to be tempered to include greater community input into the Councils perverse logic of building more homes in the outer areas when there is much scope for putting homes where the jobs are, In the City and Towns.

Conservative spokesman for Housing, Planning and Transport.

Note;- SUDS is Sustainable Urban Drainage Systems (SUDS) which returns rainwater back into the ground gradually hence preventative action to reduce floods.