

Community Infrastructure Levy: Draft Charging Schedule

Regulation 16 and 17 of The Community Infrastructure Levy Regulations 2010 (as amended)

Draft Charging Schedule - Representation Form

Monday 14th December 2015 to Monday 8th February 2016

This is your opportunity to comment on the Community Infrastructure Levy (CIL) Draft Charging Schedule. You can access the CIL Draft Charging Schedule and supporting documents online from our website: www.bradford.gov.uk/planningpolicy. The documents and can also be viewed at the Council Planning Offices and main libraries.

For further information you can contact the Development Plans team by:

- Emailing us at: planning.policy@bradford.gov.uk
- Phoning us on: (01274) 433679

Please make your representation on this form

This form has two parts:

- Part A – Personal Details
- Part B – Your Representation.

Please return this completed representation form to the Development Plans Team by either:

- E-mail to: planning.policy@bradford.gov.uk
- Post to: Development Plans, City of Bradford Metropolitan District Council,
2nd Floor South, Jacobs Well, Nelson Street, Bradford, BD1 5RW

Comments should be received within the 8 week consultation period which will run from Monday 14th December 2015 until **1.00 pm on Monday 8th February 2016**

Copies of the comments will be made available for public inspection and cannot be treated as confidential.

Personal Details & Data Protection Act 1998

Regulation 19 of the Community Infrastructure Regulations 2010 (as amended) requires all representations received to be submitted to the CIL Examiner. By completing this form you are giving your consent to the processing of personal data by the City of Bradford Metropolitan District Council and that any information received by the Council, including personal data may be put into the public domain, including on the Council's website. The information you supply will only be used and retained for the purpose of preparing the Local Plan. Please note that the Council cannot accept any anonymous comments.

PART B – YOUR REPRESENTATION -

Q1 Do you consider that the proposed levy rates in the Draft Charging Schedule have been informed by appropriate available evidence?

(please tick the appropriate box)

Yes: No:

Please provide any relevant evidence to support or justify your comment, or any suggested change(s), below.

- Bradford Council and its consultants, including DTZ in the report 'Bradford Community Infrastructure Levy Viability Evidence, DTZ June 2015' (DTZ June 2015) have substantially over estimated the strength of the Bradford property market and its capacity to deliver homes for sale in Bradford. This has serious implications in that their expectations regarding the value that might be extracted via the CIL are inflated.
- They have also overestimated the need for new housing and therefore the size of customer base for all types of housing but particularly commercial (market value) housing further inflating the Council's expectations regarding the sums that could be raised through CIL.
- DTZ June 2015 has misapplied a mathematical formula which links household formation rates to economic constraints. This will have further inflated the estimate of future demand for new homes in economic scenarios used in the report, particularly demand for commercial (market value) development.
- Development at the level proposed is neither required nor possible. The CIL receipts anticipated will not be forthcoming and the infrastructure proposed will be not be affordable, however, much of it will not be required.

An examination of data underpinning various documents associated with Bradford's Local Plan shows that it is undeliverable for the following reasons:

Bradford's housing market has been misinterpreted and misrepresented throughout the plan making process. Bradford Council and its Consultants have failed to recognise that the local market has not recovered from the crash of 2008, that it continued to fall after the crash and that it is currently blighted by stagnation and high levels of negative equity.

In addition, even in the most optimistic job growth scenario presented by the Consultants (Edge Analytics), the house building proposed would exceed the number of customers capable of raising a mortgage by a considerable margin. There is insufficient social rented housing in the mix to deliver the shortfall.

These factors render it impossible to deliver commercial development (market housing) or affordable (intermediate housing) at the levels proposed in the Local Plan.

They also render it impossible to deliver the Community Infrastructure Levy at the values set

out in the proposals produced by DTZ in June 2015 and as a consequence the Infrastructure Plan is undeliverable.

However, population growth and housing requirements have been overestimated therefore it is unnecessary to attempt to deliver housing (commercial or otherwise) at these levels. Reducing the housing requirements to a more realistic figure, one that is based on the evidence, is the only way to deliver an achievable plan that meets the needs of communities across the District; it would also reduce the infrastructure requirements. Most importantly it would reduce the need for dispersed infrastructure in the greenbelt which would be particularly costly not only to build but also to maintain.

This submission draws attention to a few of the issues associated with data presented during the plan making process but acknowledges that a more extensive analysis of the record would be required to clarify whether there were further issues and what the implications of that might be.

Misinterpretation of the Bradford housing market and land values

Bradford Council and its consultants (including DTZ) have failed to recognise or acknowledge that Bradford's housing market has not recovered from the crash of 2008; that it is stagnant and that it is constrained by high levels of negative equity. Their assumptions regarding the feasibility of delivering high levels of development, particularly high levels of the valuable development that might provide substantial CIL receipts, are therefore wrong. The underlying data, far from supporting the narrative of high population growth leading to a hefty demand for new homes and rosy prospects for CIL receipts is entirely consistent with the following:

- Bradford has a depressed housing market that is characterised by negative equity
- The depression in the housing market is consistent with, and a consequence of, the poor economic performance of the District
- The poor economic performance of the District is evidenced by the economic data, including that in the REM, and reflects poor education levels as follows:
 - High unemployment rates and high general economic inactivity rates
 - Low jobs growth (circa 1,600 per annum)
 - Poor productivity levels, low GVA
 - Poor educational performance and low levels of educational attainment among both school leavers and the adult population
 - Low skills levels among the population
 - Poor retention of graduates despite Bradford having a University
 - Low survival rates among start-up businesses. The one and two year survival rates seem promising but the three year survival rate is poor. New businesses in the central zone have rate relief at start up which assists with early survival but despite businesses having an ongoing benefit in the form of access to cheap premises (because the property market is depressed) many do not survive in the longer term.
- The economic data is consistent with the population projections and household projections published by the DCLG and the ONS. These are well over 32% lower than those being put forward by the Council and its consultants (ie the DCLG assumes only 28,000 new households will be created between 2015 and 2030 not 42,000 by 2028)

A buoyant property market and high net inward migration would not be expected in these

circumstances, however there is also direct evidence that the property market is depressed and that Bradford Council, DTZ and others have substantially overestimated house prices and by extension exaggerated the prospects for housebuilding. DTZ makes the following statement:

‘The average house price in Bradford currently stands at circa £149,000’ (referring to Q3 2014)

Page 60 Bradford Community Infrastructure Viability Evidence; DTZ; June 2015

This is over 50% higher than the Land Registry estimates for the same year which range from £92,500 to £97,151. DTZ appears to have taken sold prices from the Land Registry database and calculated the mean sold price rather than using the Land Registry estimates. This is an inappropriate method for estimating property prices and price changes over time, primarily because it is subject to transactional bias. Please see the following for a full explanation:

National Statistician’s Review of House Price Statistics

Jill Matheson (National Statistician & Chief Executive of the UK Statistics Authority); December 2010.

Transactional bias occurs because some types of property are subject to greater turnover than others and contribute disproportionately to mean sold prices. The effect can be amplified in a falling market to the extent that, even where actual property prices are falling across the board, the mean sold price rises. This happens because turnover falls away at the bottom of the market when many first time owners (who are disproportionately clustered at the lower end) are trapped in negative equity and unable to move while owners higher up in the market who have high levels of equity built up continue to buy and sell properties. Such a shift in transactional bias can be seen in the Land Registry records when sold prices and transaction volumes in the years 2007/8 and 2014/15 in different value areas across Bradford are compared (see Table 1 Appendix 1). The number of transactions taking place in areas with low property prices fall dramatically while transactions in higher value areas hold up. At the same time house prices fall across the board but those in lower value areas fall the most. DTZ’s estimates of mean property prices for various types of property are set alongside those of the Land Registry in Tables 2 and 3 (Appendix 1). The evidence shows clearly that DTZ has substantially overestimated property prices and overlooked negative equity in the local market.

Using an inaccurate estimate of property price and overlooking negative equity has profound implications for, among other things:

- Estimates regarding the value of land and potential uplift from development
- Viability estimates in relation to development
- Potential CIL receipts and infrastructure plans based on them
- Price setting where the Local Authority compulsorily purchases land or sells land it owns
- Negotiations between the Local Authority and other partners involved in developing land that it owns
- Estimates of the size of the customer base and estimates relating to the potential size of the development market locally
- Estimates regarding the number of homes that could be delivered across the District
- Proposals regarding optimal housing mix (ie price points and price range for market housing,

- balance between market and affordable including volumes of social rented housing)
- Where price points for affordable housing should be set to meet the DCLG (PPS 3) definition of affordable housing
- The optimum strategy for meeting housing need/reducing homelessness across the District

Property prices impact on land values, on the uplift that can be achieved through development and on the value that can be extracted through the CIL therefore accuracy in estimating them is crucial. However, there is a further problem with DTZ's estimates of prices that impacts even more directly on the CIL: in the absence of hard evidence from land transactions DTZ simply asked property developers and land owners to give their views of land prices in Bradford District to provide a foundation for calculations regarding uplift. This is not acceptable. HMRC has a methodology which is not based on land transactions per se. It was used following the 2008 crash to calculate losses in the value of land banks held by developers (including some represented in the consultations and negotiations associated with Bradford's Local Plan) allowing them to offset those paper losses against their earnings during the 2008/9 financial year. Their tax relief at that time amounted to billions of pounds and they, by and large, continued to own the land. Reliance on developers' estimates in this situation may place the Local Authority and the people of Bradford at a disadvantage in securing best value in relation to the CIL and/or may adversely affect prices where compulsory purchase orders are implemented or land is disposed of by the Council. The Council is asked to ascertain what methodology was implemented by HMRC and adopt it or an acceptably rigorous and transparent alternative, bearing in mind that falling house prices across the District will have adversely affected the underlying value and potential cost of development land with the effect being particularly strong in the sub-areas with the weakest markets.

Discrepancy between projected jobs growth and assumptions regarding potential house sales

In the following document:

Bradford Housing Requirement Study – updated demographic analysis and forecasts, Edge Analytics, September 2014

Edge Analytics presents a number of scenarios for households change, jobs growth and dwellings required to 2030 based on various iterations of the ONS population projections and different assumptions regarding household formation rates. These are set alongside an employment led scenario based on the Yorkshire and Humber REM data available at the time (BHRS 2014, page 18) (see Table 4). What this data shows is that where high household formation rates are assumed (Scenario B) house building starts to run ahead of job creation, even when jobs freed up by retirements among older workers are factored into the equation and even if the wage earners are spread out so that none of them live together (See Table 5). It follows from this that, where high household formation rates are assumed, a substantial number of the new homes would have to be rentals because individuals not in employment would be unable to raise a mortgage to fund the purchase of a home even under an intermediate/part ownership scheme. The situation worsens if as few as 15% of new homes are occupied by two wage earners, which is a conservative estimate given that the market analysis produced by DTZ makes it clear that house builders involved in the development of Bradford's Local Plan intend to target their products at dual income couples. (see Table 6).

But the Bradford Local Plan is even less tenable than DTZ's scenarios because it proposes that

42,100 new homes would be built by 2028, the majority of which it assumes would be sold either on the open market or under an intermediate affordable housing arrangement. Tables A and B overleaf show the deficit in the number of mortgages that could be raised relative to the number of homes built in this situation against the associated job formation totals posited by Edge. They show that this Local Plan would be unachievable unless there was a major drive in the building of (social) rented housing even if the population was growing and households were forming at the rates assumed.

Table A
Jobs available to provide mortgages to 2028 assuming all new homes supported by a single wage

Scenario	Jobs created plus jobs freed up by retirees	New homes proposed	Surplus jobs to new homes	Deficit jobs to new homes
PG 10 Year	42,378	42,100	278	
SNPP 2010	37,958	42,100		- 4,142
PG 5 Year	38,094	42,100		- 4,006
Natural Change	35,000	42,100		- 7,100
Jobs Led REM	35,612	42,100		- 6,480
SNPP 2012	30,427	42,100		- 11,673

Table B
Jobs available for mortgages to 2028 assuming 15% of new homes are occupied by two wage earners

Scenario	Jobs created plus jobs freed up by retirees	Mortgages available (85% x no of jobs)	New homes proposed	Deficit jobs to new homes
PG 10 Year	42,378	36,021	42,100	- 6,079
SNPP 2010	37,958	32,264	42,100	- 9,836
PG 5 Year	38,094	32,380	42,100	- 9,720
Natural Change	35,000	29,750	42,100	- 12,350
Jobs Led REM	35,612	30,270	42,100	-11,830
SNPP 2012	30,427	25,863	42,100	- 16,237

Clearly, the ambition to build 42,100 homes by 2028, the bulk of which would be bought either at market rates or under shared ownership arrangements is fanciful. Happily it will not be necessary.

Population Growth and Housing Requirements

The additional homes not supported by the population evidence from DCLG and the ONS can be dropped which would eliminate some of the problems described above. There is no evidence that they are required. However, there are further problems with the Edge Analytic report that indicate that data may have been manipulated inappropriately. This may be due to faulty data inputting at the analysis, faulty mathematical reasoning or typographic errors in the report itself. However they came about they are crucial. It is not possible to check Edge Analytics' arithmetic, they do not provide enough data but if the figures they have presented are accurate there is clearly a problem with at least some of their calculations even before housing numbers are inflated to yield 42,100 by 2028. The product doesn't stack up; there are clear mathematical sources of error if the accompanying narrative is accurate and the figures have been typed in properly. On page 2 they state that they have made the following assumptions:

- Economic activity rates from the 2011 Census
- Commuting ratio from the 2011 Census
- Unemployment rates which reflect economic 'recovery'

The most obvious problem here lies in the assumptions about economic activity and unemployment. Looking back at Table 4 we can see that the two clusters of Scenarios 'A' and 'B' represent different household formation rates. The 'A' cluster is based on household headship rates taken from 2011, a period of economic constraint and job loss while cluster 'B' is based on the pre-crash 2008 headship rates. The 'B' cluster shows higher levels of household formation leading to a need for more housebuilding. But this is not compatible with the assumption that economic inactivity rates and unemployment rates will be the same as those in Scenario A. The variables should be moving in opposite directions. Economically inactive people are people of working age who are not working and not claiming unemployment benefits. Most of them are women supported by a working partner though dependent adults in any household arrangement would qualify. If these people left their wage earning partner/family and set up homes of their own they would cease to be 'economically inactive' and generally become benefits claimants who were supported by JSA unless they got a job. The economic inactivity rate would go down and the unemployment rate would go up.

The second problem is that the number of jobs given in the different scenarios is not varying against population change to the extent required to yield the same degree of economic recovery. In their narrative Edge (page 16) says the following when explaining the assumptions they have made about unemployment in all of the scenarios bar the two driven by REM job creation figures:

'The unemployment rate has been incrementally reduced to account for economic recovery'

On page 35 they explain this further:

‘An average ‘recession’ unemployment rate (2008-12) of 9.8% is applied in 2012. The unemployment rate then incrementally decreases to the ‘pre-recession’ average (2004-2007) of 6.3% by 2030.

The problem is that the figures they have given on page 18 appear to show that they have not done this. I will just give two examples here. The PG 10 Year Scenarios show population change of 85,422 alongside job creation of 1,934 per annum (36,746 in total). The SNPP – 2012 Scenarios show population growth of 56,928 set alongside job creation at 1,231 per annum (23,389 in total). The PG 10 year population figure is much higher than the SNPP 2012 figure, primarily because it assumes high levels of inward migration so most of the difference between it and the 2012 figure lies in the size of the adult population it presumes. Job creation would need to be a lot higher in the PG 10 year scenario to deliver a reduction in unemployment to 6.3% in the time frame given if economic inactivity rates were the same in the two cases. Or to put it another way, unemployment and/or economic inactivity rates would be rising dramatically in the PG 10 Year scenarios.

As I said earlier, this may be a series of typographic or reporting errors, however, the feasibility of this plan rests on whether job creation is likely to be at a level to deliver not only the new homes proposed but also the population projected so whatever the background it is crucial. Bradford currently experiences an outflow of working people who migrate because of the lack of jobs. It had, last time I looked, a job density of 0.67 (NOMIS data). This is pitifully low for a city. Many more jobs would be required to stem the outflow and retain the working population not just to fund housebuilding. Looking at the figures presented by Edge most of the scenarios show that jobs would need to be created at a phenomenal rate. The Inspector is familiar with the recent court case involving a Miller Homes site at Boston Spa where the evidence presented by Edge Analytics and Leeds City Council highlighted the fact that even during the pre-recession boom Leeds, which has a jobs density over 0.9 and a population base that is far larger than Bradford’s, delivered fewer than 700 new jobs per annum. The high household formation rates underpinning the build rates presented by Edge will require far more jobs. That is not a realistic proposition as has been acknowledged by the Council in the Main Modifications to the Local Plan where it has accepted the REM based prediction for job creation of 1,600 per annum; the higher level household formation rate scenarios in particular would require multiples of this.

Implications for the Community Infrastructure Levy and the Infrastructure Plan

It is apparent from the above that the CIL and the Infrastructure Plan cannot be delivered but it is also clear that house building at the volume proposed is neither feasible nor necessary; therefore, some of the infrastructure is not needed. This takes some of the pressure out of the situation. However, the evidence shows that Bradford does have a serious problem in relation to the delivery of new housing in that property prices in many sub areas are substantially below

those required to attract commercial developers.

The saving grace here is that some sub areas, generally around communities in the greenbelt and particularly within communities in Wharfedale, show house prices holding up. It is doubtful whether greenbelt releases could be justified here given the data underpinning the plan which points to issues around objectively assessed need and they are highly likely to be energetically challenged. However, there is previously developed land within prosperous communities that could be exploited more effectively to deliver genuinely affordable housing in areas of high need within the City of Bradford and the town of Keighley. Ilkley, for example, may have space for as many as 550 homes on PDL. It also has significantly higher property prices than other areas, even other areas in Wharfedale. This might be exploited by limiting development to PDL, decreasing CIL, increasing Section 106 funding for affordable housing and transferring the Section 106 housing receipts to sites in Keighley or Bradford where it could deliver far more homes and where there is genuine housing need. The Government's Productivity Plan contains proposals to amend compulsory purchase arrangements to make them more straightforward and 'fairer'. This may open the way for the Council to engage in the purchase and development of land and some house sales. Accurately evaluating property prices in sub areas (and even specific communities) across the District would enable it to maximise receipts, acquire land at a fair price and secure the best outcome for the people of Bradford.

There are a variety of resources locally that might be helpful in delivering homes in what is undoubtedly a challenging market. In-Communities know about non-conventional, low cost building techniques and could develop proposals centred on delivering best value but there are also other resources that might be helpful. The Ecology Building Society based at Silsden funds self-builders. It has limited resources but is part of a wider network. Islamic financial institutions deliver Sharia mortgages. These come in different forms but the essential element is that they are all part-ownership schemes and could potentially provide leverage for central Government funds. Smaller builders/developers, who are currently struggling in the market here and do not appear to have been involved much in discussions to date, might be encouraged to syndicate. In addition, there is NG Bailey, a company which has a track record in delivering pre-engineered industrial units and may have an interest in diversifying into pre-engineered housing (which presents the tantalising prospect of Bradford exporting kit houses to other areas and raising its GDP). And finally GVA might be engaged. They delivered some questionable research during the plan-making process, however, they have since been taken over by Bilfinger. Bilfinger is a German company with origins in the engineering industry but it has diversified into property. It designs, builds and manages developments on the continent. German companies have substantial experience of non-conventional build techniques and have historically delivered build costs that are lower than those of UK developers. GVA has offices in Leeds.

Some final points

Planning housing is not just about bricks and mortar it is about people's lives; particularly the lives of children in deprived and struggling communities. Bradford needs to have an evidence based and thereby deliverable Local Plan because if it doesn't some, possibly many, of them will be condemned to live in overcrowded, sub-standard and insecure accommodation. Childhood has a profound effect on life outcomes and children have one, short shot at it. They deserve better than this.

On top of this many of us who live within the District are utterly dismayed by the chaotic way the Council operates. Much, if not most, of that chaos is generated by a cavalier approach to evidence. We need a Council that generates proposals based on evidence, not just those around housing but across the board. Ofsted has stepped in to highlight problems with the education system that have been pushed under the carpet here for well over a decade. Care for the elderly only improved after deaths from bed-sore related septicaemia in Council run/commissioned homes rendered it impossible for services to continue as they were. We need external agencies such as OFSTED, the Care Quality Commission and the Planning Inspectorate to assist us in pursuing reform, we cannot do it on alone.

Q2 Do you consider that the proposed rates are informed by, and consistent with, the evidence on economic viability across the District?

(please tick the appropriate box)

Yes: No:

Please provide any relevant evidence to support or justify your comment, or any suggested change(s), below.

An accurate assessment of land values needs to be undertaken before setting CIL rates.

DTZ (Bradford Community Infrastructure Levy Viability Evidence, DTZ June 2015) state that in the absence of hard evidence from land transactions they simply asked property developers and landowners to give their views on local land prices to provide a foundation for calculations regarding uplift and potential CIL receipts. This is not acceptable as developers and landowners have a clear commercial interest in the matter. Neither is it necessary. HMRC has a methodology which is not based on land transactions per se. It was used following the 2008 crash to calculate losses in the value of land banks held by developers allowing them to offset these paper losses against profits made on the sale of houses during 2008/9.

The proposed CIL rates are not informed by the evidence as the evidence has not been examined.

Q3 Do you consider that the proposed levy rates would strike an appropriate balance between securing additional investment to support the development identified in the local plan, and the potential effects on the viability of developments in the Bradford district?

(please tick the appropriate box)

Yes: No:

Please provide any relevant evidence to support or justify your answer, or any suggested change(s), below.

Given the weakness of the local property market there will be problems extracting CIL at any level in some areas. In others CIL levels would need to be limited in order to maintain the commercial viability of developments. The Council should opt for lower levels of housebuilding and scale back its infrastructure plans. It should concentrate building in urban areas where there is actual need and pre-existing infrastructure and as far as possible steer development onto brownfield sites where infrastructure is being underused. This would reduce the need for CIL money.

Q4 Do you have any comments to make on whether the council has complied with the legislative requirements set out in the Planning Act 2008 and the Community Infrastructure Levy Regulations (as amended)?

Yes: No:

Please provide any relevant evidence to support or justify your comment, or any suggested change(s) below.

The Council cannot have complied with the legislation (eg in relation to consultation) because the evidence it presented alongside its proposals was wrong and misled those being consulted.

Q5 Do you have any comments to make on the Draft Regulation 123 list, and the approach to the continued use of section 106 obligations?

(please tick the appropriate box)

Yes: No:

Please provide any relevant evidence to support or justify your comment, or any suggested change(s), below.

[Click here to enter text.](#)

Q6 Do you have any comments to make on the *Draft Exceptional Circumstances*

Relief Policy?

(please tick the appropriate box)

Yes: No:

Q6 Do you have any comments to make on the *Draft Instalments Policy*?

(please tick the appropriate box)

Yes: No:

Q8 Please provide any other comments below that you wish to make on the *Draft Charging Schedule*.

[Click here to enter text.](#)

The draft charging schedule needs to be directed towards supporting a realistic and appropriate Infrastructure Plan. It is not.

The infrastructure plan attached to the consultation is based on proposals regarding housing numbers in various settlements that pre-date the Main Modifications. The Main Modifications, if accepted, will substantially increase housing numbers in Wharfedale and Silsden. The infrastructure needs to be improved if housing is delivered. The narrative contained in the Infrastructure Plan is also misleading in a number of areas, I'll give just two examples:

Flooding: Ilkley floods regularly, primarily because of run off from the moor. These are relatively brief events that don't make the national press. However, they render the A65 dangerous at points to either side of Ilkley (Manor Park to the East and all along the stretch towards the junction to Silsden at the West). The A65 is the only substantial road into, and out of, Ilkley and the three smaller roads are dangerous in bad weather (two are steep and slippery, one floods from the river, all are narrow and winding). In town we have regular episodes where drains overflow and create streams in the streets and down footpaths. This tears the surface from roads and footways. It also causes considerable damage to private property (my home last flooded in 2000/2001, I live half way up the side of the steep hill towards the moor). The Council has not shown due diligence in examining flood risk or considered the limits of our (combined) sewerage/drainage system.

School places: The Council states that most of the demand for additional school places is from the existing population (thereby implying that adding 2,500 new homes to Wharfedale and Silsden won't make any difference). Please be aware that the Council combined the figures on school places and demand for school places in Wharfedale (where secondary school places are oversubscribed) with those for Keighley (where they are undersubscribed). Despite the fact that Keighley is miles away. This prevented us from accessing Government funding

for school expansion/rebuilding the school. The site proposed for a new secondary school/annexe to the existing school was on Coutances Way. The Council has now put the site into its SHLAA. At various points during the (several years' worth) of discussion associated with building new school premises, Council Officers cited flooding/waterlogging on the site as being material in blocking development there.

From the Infrastructure Plan it appears as though it is the intention of the Council to use house building in Wharfedale as a device to raise CIL receipts to fund the development of infrastructure elsewhere. The Council does not appear to be proposing any substantial improvement to infrastructure in Wharfedale despite the number of houses proposed.

Post Script: Please see appendices for tables sent separately. These could not be embedded in this form because of formatting difficulties

Examination

In order for the Council to introduce a CIL the Charging Schedule must be approved by an independent Examiner.

Please tick the relevant boxes:-

I would like to be heard by the Examiner at the examination.

I would like to be notified that the Draft Charging Schedule has been submitted to the examiner

I would like to be notified of the publication of the recommendations of the examiner and reasons for those recommendations.

I would like to be notified of approval of the charging schedule by Bradford Council.

(Please ensure you have provided your email address, if possible, as this is the Council's preferred method of contact). E-mail: jabittler@aol.com

3. Signature:

[Redacted Signature]

Date:

8th February 2016

Thank you for taking the time to complete this Representation Form.