

Local Plan for the Bradford District

Community Infrastructure Levy: Draft Charging Schedule

Statement of Consultation and Summary of Representations

**Regulation 17 and 19 of the Community Infrastructure
Levy Regulations 2010 (as amended)**

2016

CONTENTS

- 1.0 Introduction
- 2.0 Period of Consultation
- 3.0 Bodies invited to make representations
- 4.0 Publication of the draft charging schedule
- 5.0 Representation Statement and Summary of the main issues raised by the representations
- 6.0 Changes to the Draft Charging Schedule as a result of consultation

LIST OF APPENDICES

1. List of specific and general bodies and persons the Council invited to make representations & table indicating numbers consulted.
2. Statement of Representation Procedure
3. Press Notice and Local Advertisement Notice
4. Newsletter - *Plan-it Bradford*
5. Council's Website
6. Summary of Representations and Council Response

1.0 INTRODUCTION

- 1.1 The Community Infrastructure Levy (CIL) is a tool for local authorities to help deliver infrastructure to support the development of the area. The levy came into force in April 2010 and local authorities wishing to utilise CIL to raise funds for infrastructure are required to develop a charging schedule.
- 1.2 A Draft Charging Schedule (DCS) is a document which sets out the charging authority's proposals for the levy, for public consultation. The City of Bradford Metropolitan District Council (the Council) is a charging authority under the CIL Legislation. This report summarises the consultation process carried out for the DCS, in advance of submission of the CIL DCS for independent examination.
- 1.3 Following consultation on the DCS the council will submit the DCS, relevant evidence and any representations made in accordance with CIL Regulation 17 to the Examiner. The Examiner will consider the comments received on the DCS as part of the CIL examination.

Purpose of this document

- 1.4 This document summarises the entire consultation process which has been undertaken for the DCS together with supporting evidence consisting of:
- CIL Economic Viability Evidence (June 2015)
 - CIL Viability Evidence Addendum (December 2015)
 - Local Infrastructure Plan Evidence (Update December 2015)
- 1.5 This consultation stage is referred to as the Draft Charging Schedule stage as it will lead to the Draft Charging Schedule being submitted to the CIL examiner.
- 1.6 This Statement of Consultation and Summary of Representations provides details of those consulted and methods of consultation. The report then provides a summary of the main issues raised by those making representations and the Council's response to those issues.

2.0 PERIOD OF CONSULTATION

2.1 The Draft Charging Schedule was published for public consultation over an 8 week period, from Monday 14th December and ending 1.00pm on Monday 8th February 2016. The Council made available and republished the Draft Charging Schedule alongside a Local Advertisement Notice in accordance with CIL Regulation 16 1(d) for a further 4 weeks from Friday 25th March to Friday 22nd April 2016.

3.0 BODIES INVITED TO MAKE REPRESENTATIONS

3.1 The Council's main consultation lists comprises a number of bodies and persons of which is made up of the specific and general bodies, and those persons who wish to be notified about the preparation of the Local Plan. Appendix 1 provides a list of those invited to make representations to the DCS stage and also the numbers informed by email and by letter.

3.2 The consultation lists accords with the Council's Statement of Community Involvement (SCI) (*Submission SCI 2006 and adopted SCI July 2008*) which also sets out the specific, general and other consultation bodies would be consulted during the preparation of Local Plan related reports. This includes each of the Consultation Bodies listed under CIL Regulation 15(3).

4.0 PUBLICATION OF THE DRAFT CHARGING SCHEDULE

4.1 The Council used a number of methods to invite people to make written representations and comments. The methods used by the Council are summarised in Table 2 below:

Table 2 – How bodies and persons were invited to make representations	
Pre-Submission	<ul style="list-style-type: none">• Consultation letters/emails to bodies and persons (see Appendix 1)

Consultation (2015/ 2016)	<ul style="list-style-type: none"> • Via a Representation Form • Via information included in press release and local advertisement notice (see Appendix 3) • Issue 25 of the e-Newsletter - <i>Plan-it Bradford</i> – November 2015 (see Appendix 4) • Consultation information at deposit locations • Consultation information on the Council's website (see Appendix 5)
--------------------------------------	--

4.2 The council published the CIL DCS, a Statement of Representations Procedure and relevant supporting evidence on its website at: www.bradford.gov.uk/planningpolicy . A link to the CIL DCS Consultation website was also provided on the council's main consultation webpage at: www.bradford.gov.uk/bmdc/Consultations .

4.3 In addition a copy of the DCS, the relevant evidence and statement of the representations procedure were made available for inspection at the following locations:

Main Council Offices

- Planning Reception, Jacobs Well, Nelson Street, Bradford, BD1 5RW
- Shipley Town Hall, Kirkgate, Shipley, BD18 3EJ
- Keighley One Stop Shop, Town Hall, Bow Street, Keighley, BD21 3SX
- Ilkley Town Hall, Station Road, Ilkley, LS29 8HA

Main Local Libraries

- Bradford City Library, Centenary Square, Bradford, BD1 1NN
- Bingley Library, Myrtle Walk, Bingley, BD16 1AW
- Keighley Library, North Street, Keighley, BD21 3SX
- Ilkley Library, Station Road, Ilkley, LS29 8HA

5.0 REPRESENTATION STATEMENT & SUMMARY OF THE MAIN ISSUES RAISED BY THE REPRESENTATIONS

Number of Representations Made

- 5.1 A total of **24** representations were considered to be duly made, in accordance with regulation CIL Regulation 17. These are summarised in Table 3 below.

Table 3. Summary table of comments duly made categorised into relevant consultation groups / bodies:		
Comments received from:	Number of comments received:	Details:
Residents / individuals	5	
Developers, Consultants	2	The Planning Bureau Ltd, Johnson Brook
Statutory Consultees (Government/ Consultation Bodies)	4	Historic England, Highways England, Sport England, Natural England
Local Planning Authorities / Councils	1	North Yorkshire County Council
Town, Parish and Community Councils	5	Silsden TC, Wilsden PC, Burley PC, Menston PC, Addingham PC
Councillors	1	
Specific Organisations	4	National Farmers Union, Canal & River Trust , Bradford Chamber of Commerce, CLA
General Organisations (Groups / Societies)	2	Ilkley Design Statement Group, Ilkley Civic Society
Total	24	

Table 4. List of those who submitted a written representation

Ref	Name	Organisation
0001	Copeland	National Farmers Union
0002	Rios	Highways England
0003	Shaw	Local resident
0004	Grint	Local Residents
0005	Smith	Historic England
0006	Brown	Local resident
0007	Emmott	Ilkley Design Statement Group
0008	Hall	Natural England
0009	Orton	Burley Parish Council
0010	Batterley	Wilsden Parish Council
0011	Ledger	Sport England
0012	Smith	Local Councillor
0013	Coy	Canal & River Trust
0014	Kidman	Ilkley Civic Society
0015	Corcoran	Silsden Town Council
0016	Pickles	Local resident
0017	Hanson	Menston Parish Council
0018	Thompson	Wharfedale Alliance for Sound Planning
0019	Thomas	The Planning Bureau Ltd
0020	Brook	Johnson Brook
0023	Markham	Addingham Parish Council
0022	Cartwright	Bradford Chamber of Commerce
0023	Harrison	CLA
0024	Rushworth	North Yorkshire County Council

CIL Draft Charging Schedule – Summary of Main Issues

5.2 Those informed of the DCS consultation were invited to comment on the following reports:

- CIL Draft Charging Schedule
- CIL Economic Viability Evidence
- CIL Economic Viability Addendum Evidence
- Local Infrastructure Plan Evidence
- Draft Regulation 123 List
- Draft Instalments Policy
- Draft Exception Circumstances Relief Policy

5.3 The main issues raised are summarised below together with the Council's response. A number of comments and issues raised were not relevant to the reports listed above, but were relevant to other parts of the Local Plan for Bradford. A full summary of representations and council responses are set out in Appendix 6.

5.4 **Issue 1:** General Support for CIL

Council's Response: Support for introducing CIL welcomed. The Government's aim for CIL is to promote a fairer, faster and more transparent system for funding new infrastructure. The council consider the introduction of the CIL will be beneficial for the Bradford District for the reasons set out in the CIL Background Report. The council have demonstrated an infrastructure funding gap through evidence in the Local Infrastructure Plan (LIP), which justifies the need for introducing a CIL charge in the District in accordance with CIL Regulations (as amended).

5.5 **Issue 2:** Proposed CIL charging rates including:

- general support for setting different rates for different zones in the District
- the proposed nominal £5 residential rate in Zone 4 is not supported by the viability evidence

- the residential rates in zones 1, 2 and 3 (specifically Silsden/Wharfedale/Wilsden) should be higher based on viability evidence and to fully reflect infrastructure costs
- general support for the zero charge rate for commercial uses and retail other than for Supermarkets of over 2000 sq m
- a different rate should be set between general residential development and specialist elderly/retirement accommodation
- rural/agricultural dwellings should be exempt in the DCS
- the council has not taken on board recommendations in the CIL Viability Assessment Addendum relating to potential for a nominal increase in the charge for Zone 3, or to re-draw the boundaries between Zone 3 and 4, or to sub-divide Zone 4 to better reflect the evidence
- objection to the residential charging rate for zone 1 at £100sq.m. This is not fully justified by the limited evidence available, including lack of clear infrastructure cost information, balance of expected CIL against other contributions (S106/278) and lower CIL rate of £90sqm in Leeds. A revised rate of £85/sq m is proposed in this zone.

Council's Response: The council consider the proposed residential CIL rates in the DCS are based on robust, appropriate and available evidence and strike an appropriate balance between the desirability of funding infrastructure from the levy and the potential impact on the viability of development.

With the exception of Zone 4, the proposed CIL rates are not set to a maximum margin of viability to allow for a viability buffer– in accordance with the Government's National Planning Practice Guidance (NPPG) (Paragraph: 020 Reference ID: 25-020-20140612).

The council recognise the CIL Viability Addendum (2015) indicates an increase in the headroom within Value Area 3 from the original viability assessment. While this indicates the potential for an increase in the charging rate in this zone, the viability evidence states that given the potential for variation in sites across Value Area 3 it is considered that caution should be

applied to any increase in the CIL rate to ensure that there is an adequate buffer retained. The CIL Viability Addendum states the proposed residential rates in Zone 3 are considered appropriate as they allow for a viability buffer in accordance with the CIL NPPG. Therefore despite the small increase in the headroom for CIL in Zone 3 the council consider that on balance the £20 is still appropriate for this zone.

In regards to the proposed £5 rate in Zone 4, it is considered that in view of the very small proportion of development costs and large infrastructure funding gap and critical infrastructure issues identified within in the main urban areas of the District on balance a nominal CIL charge of £5/sq m for residential development is justified in the lower value zones. A levy of £5/sq m is considered a nominal charge which will not realistically put delivery risk.

This is consistent with the CIL viability evidence, which states recommendations are intended as a guide but small variations could be justified. The NPPG requires that an appropriate balance must be struck between additional investment to support development and the potential effect on the viability of developments. The NPPG states that a charging authority's proposed rate or rates should be reasonable, given the available evidence, but there is no requirement for a proposed rate to exactly mirror the evidence (Paragraph: 020 Reference ID: 25-020-20140612).

The impact of CIL on a care home was modelled in the CIL Viability Assessment (June 2015). The conclusion was that this type of development was not viable to bear CIL. Therefore the DCS excludes care homes and other forms of specialist accommodation in the C2 Use Classes Order from CIL charge. The council therefore consider that the proposed DCS as drafted is appropriate.

5.6 **Issue 3:** CIL Charging Zones:

- queries raised over the methodology used to identify the residential charging zones and the reason for certain locations being in a particular proposed zone.

- charging zone 3 is very diverse and includes more affluent areas as well as less affluent areas. The area wide model adopted masks these local variations, and underplays the scope and justification to introduce a higher charging rate in some parts of the charging zone
- the revised charging zone map is still not clear in regards to which sites are at which rate

Council's Response: The NPPG states that the council should use an area based approach involving a broad test of viability across the area as evidence to inform the CIL charge (Paragraph: 020 Reference ID: 25-020-20140612) and a charging authority that plans to set differential rates should seek to avoid undue complexity (Paragraph: 022 Reference ID: 25-022-20140612). The council recognise that the District's housing market is diverse and complex and there may be local variations in values within residential charging zones; however it is considered that the CIL Viability Assessment and Addendum provide robust, appropriate and available evidence to inform setting the differential rates by geographical zone across the District. The council consider that the four charging zones proposed broadly reflect the viability of residential development across the District and avoid undue complexity in setting differential rates for residential development.

In accordance with CIL Regulation 12, the council have set out on page 12 of the DCS a CIL charging zone map which identifies the location and boundaries of the different CIL charging zones. In accordance with CIL Regulations this map is based on an Ordnance Survey map, which shows National Grid lines and reference numbers and includes an explanation of any symbol or notation used. An interactive GIS charging zone map has been provided at the Draft Charging Schedule stage on the council's website to enable zone boundaries to be viewed in greater detail at different scales.

5.7 **Issue 4:** Viability Evidence including:

- general view that the overall methodology used in the Viability Assessment appears to be soundly based although questions raised in relation to the validity of some of the data used to reach the conclusions

- queries raised over the robustness of the viability evidence in relation to the strength of the District's housing market, land value assumptions, types of sites tested and methodology used for identifying residential charging zone boundaries
- the viability assessment does not consider the viability of retirement housing, which should be specially tested
- the residential charging areas are based on flawed assumptions. The use of average house price bands assumes that the future housing mix will be directly related to the historic housing mix
- the council's current approach to transfer values differs from the assumptions used in the Viability Assessment. Further testing is therefore required if this is the new policy approach.

Council's Response: The council consider that the CIL Viability Assessment and Addendum are robust and provide appropriate evidence to inform the CIL charging rates. The methodology used in the viability assessment accords with the latest NPPG as well as best practice as laid down by the Royal Institute of Chartered Surveyors (RICS) Financial Viability in Planning (2012). The viability assessment includes an area wide viability test using hypothetical development typologies and site specific viability testing with a detailed analysis of a sample of strategic 'real world' development sites from various locations across the District. The viability evidence was updated following the Preliminary Draft Charging Schedule stage to provide an update to the economic viability evidence supporting the DCS.

The NPPG states the council should use an area based approach involving a broad test of viability across the area as evidence to inform the CIL charge (Paragraph: 020 Reference ID: 25-020-20140612). The viability assessment provides a broad assessment of the viability of developments that are considered to best reflect the key types of development that will come forward in the District as part of delivering the Local Plan Core Strategy. The assumptions used in the viability evidence have been tested through consultation with a range of stakeholders including developers, house builders and agents.

Average house prices mapped against postcode zones have been used to identify the geographical zones for viability testing CIL. Current sales values form the basis for viability testing for CIL testing purposes. These sales values are based on research of recent new build sales achieved on developments across the District. The viability evidence is therefore considered robust in relation to the District's housing market.

The CIL Viability Assessment uses a range of site value thresholds intended to be representative of typical net land prices in different parts of the District. Although evidence of transaction data is limited the viability assessment reviewed VOA Property Market reports and consulted land agents, land owners and developers in arriving at the benchmarks used. In accordance with RICS guidance, it has discounted the site value benchmarks to allow for the impact of CIL.

As set out the NPPG a charging authority that plans to set differential rates should seek to avoid undue complexity (Paragraph: 022 Reference ID: 25-022-20140612). The council recognise that there may be local variations in values within charging zones; however it is considered that the viability assessment provides robust and appropriate available evidence to inform the differential rates by geographical zone across the District.

The inputs into the CIL Viability assessment, including transfer values, were consulted on with a range of stakeholders including the council's affordable housing team. The council's affordable housing policy is outside the remit of the CIL charging schedule itself. However, while there has been no formal change to the council's approach to affordable housing transfer values since the CIL viability evidence was undertaken, it is recognised that Registered Providers ability to take on affordable housing properties secured through S106 is currently challenging. This has resulted in the need for greater flexibility in the approach to negotiating transfer values in order to secure delivery of affordable housing on certain residential schemes.

The proposed CIL rates for residential uses have been set below the maximum rates set out in the Viability Assessment and therefore include a

significant viability buffer. The Viability Assessment also takes a cautious approach in a number of assumptions, thereby increasing the overall viability buffer which should account for any differences in the approach to transfer values for affordable housing developments. It is therefore considered the District wide CIL Viability Assessment provides robust and appropriate evidence to inform the proposed CIL charging rates and the council has been struck an appropriate balance between the need to fund infrastructure and impact on viability.

5.8 **Issue 5:** Local Infrastructure Plan (LIP) Evidence:

- the LIP should provide a more detailed assessment of infrastructure costs and delivery
- evidence in the LIP is not detailed enough in terms of costs and funding for infrastructure to be able to strike an appropriate balance
- the LIP needs updating to take account latest events, e.g. recent flooding
- the LIP is based on the Core Strategy which is still being considered through examination in public

Council's Response: The council consider that the LIP provides robust, appropriate and available evidence to inform the CIL DCS. NPPG (Paragraph: 017 Reference ID: 25-017-20140612) states that information on the District's infrastructure needs should be drawn from the infrastructure assessment that was undertaken as part of preparing the relevant Plan. The Council has worked in partnership with infrastructure delivery partners, through the preparation of the LIP, which sets out how the Local Plan Core Strategy will be supported by appropriate infrastructure. The LIP is a live document which is updated on a regular basis in consultation with key partners, local communities and infrastructure providers. The LIP identifies the strategic infrastructure requirements in relation to delivering growth in the District.

The LIP provides evidence of an aggregate funding gap that demonstrates the need to put in place the levy and has helped inform the Draft Regulation 123 List. It is recognised in the NPPG (Paragraph: 017 Reference ID: 25-017-20140612) that there will be uncertainty in pinpointing infrastructure funding

sources, particularly beyond the short term. Therefore the focus of the LIP in regards to the CIL DCS is on providing evidence of an aggregate funding gap that demonstrates the need to put in place the levy.

5.9 **Issue 6:** Regulation 123 List

- the draft list is lacking in detail. Recommendations for specific projects to be included, for it to be made clearer to ensure there is no scope for double dipping and queries over continued use of S106 agreements
- the list should be made more explicit in relation to prioritising habitat mitigation and reference should be made in regards to the importance of securing such measures
- support inclusion of green infrastructure on 123 list but concern raised the inland waterway network could be subsumed within a very broad type of green infrastructure and the need to more precisely define GI projects on the list
- support for the exemption of sport improvements which are directly related to a development, however suggestion that this wording is broadened to include replacement sports facilities and playing fields at the time of a planning application.

Council Response: The Council's LIP sets out the strategic infrastructure requirements in relation to delivering growth in the District. This has helped inform the Draft Regulation 123 List. The Regulation 123 List sets out the items of infrastructure the council may fund through the CIL. The Draft 123 List has been prepared in line with the CIL Regulations and it is not considered appropriate at this time for the Council to be any more specific, for instance, it is not the role of the R123 list to identify spending priorities within it.

From April 2015 the pooling restrictions of obligations came into force and Section 106 agreements will be scaled back to those matters that are directly related to a specific site and not set out in the R123 list when a CIL is introduced. S106 will not be sought for items on the R123 List in accordance with CIL Regulations. The relationship between S106 and CIL is set out as part of the 123 list to avoid “double dipping”. Following

adoption, CIL collection and spending will be monitored and reported on to ensure transparency over the use of the levy to ensure there is no double dipping.

Infrastructure delivery issues including securing adequate mitigation for European site impacts and flood risk mitigation are outside the remit of the CIL charging schedule and will be addressed through the Local Plan/development management considerations following adoption of the CIL. The 123 List, will be regularly reviewed a following adoption of CIL, based on the on up to date evidence and may be updated to reflected latest infrastructure evidence.

5.10 **Issue 7:** CIL Implementation /spending including:

- various questions raised in relation to CIL implementation including collecting, spending, the neighbourhood proportion and payments in kind
- a much higher percentage of CIL should go to the area where the development is to take place
- further detail on the relationship between planning obligations and CIL needs setting out

Council's Response: The CIL Draft Charging Schedule is primarily concerned with the rates the CIL is to be set at, rather than the mechanisms for implementing CIL. Detailed information on CIL implementation, spending, collecting and reporting is not part of the charging schedule itself. Further engagement with relevant stakeholders and detailed guidance will be set out in the run up to CIL implementation. This will include arrangements for implementation, governance and spending of CIL where appropriate.

The CIL Regulations require a proportion of CIL recipes to be passed to local communities where development has taken place. The neighbourhood portion is set out in the CIL Regulations. The Council has not yet made any decisions on any further local ring fencing. This is outside the remit of the Charging Schedule itself.

The council has provided detail on the relationship and continued use of planning obligations and the relationship between S106 or S278 and CIL as part of the Regulation 123 List.

- 5.11 **Issue 8:** Draft instalments policy and exceptional circumstances relief policy:
- general support for the provision of an instalment and exception policy
 - comment that the draft instalments policy appears to favour larger schemes
 - suggested changes to instalments policy help to ensure funding comes forward is front loaded to help provision of infrastructure improvements before or parallel with development.
 - clarification should be given the exceptional circumstance relief policy will only be used in exceptional circumstances, and relief should be offered where CIL would have a harmful impact upon the economic viability of developments which involve heritage assets, particularly those which are at risk.

Council's Response: The Council are considering introducing an instalments and exceptional circumstances policy, under CIL Regulations. A draft policy has been provided for comment as part of the Draft Charging Schedule Consultation This is not part of the CIL charging schedule and may be published separately to the CIL.

The instalments policy is based on the recommendations of the CIL Viability assessment. It is considered the instalments policy will increase the flexibility of payments for developers and support the viability and delivery of development of larger schemes by improving the cash flow of a development.

It is the intention that the exception policy will only apply should exceptional circumstances, in accordance with the CIL Regulations. This may include schemes where CIL would have a harmful impact upon the economic viability of developments which involve heritage assets.

The council will consider comments raised and any approved policy will be published on the council's website following adoption of CIL.

- 5.12 **Issue 9:** CIL process:

- CIL must be based on a relevant plan, the Core Strategy has not yet been adopted therefore CIL should not be produced in advance of this
- the evidence presented is flawed and has not been examined
- some concern raised over consultation process not using the full scope of resources available to generate responses

Council's Response: Consultation on the CIL has been undertaken in accordance with the CIL Regulations 2010 (as amended). This is set out in the Statement of Consultation and Statement of statutory and procedural compliance.

The relevant plan is the Local Plan. The Local Plan Core Strategy is currently being considered through an Examination in Public. The CIL has been worked up alongside the production of the Bradford District Local Plan Core Strategy in line with CIL Regulations and NPPG (Paragraph: 017 Reference ID: 25-017-20140612). The council considers that the CIL is based on robust, relevant and available evidence. This evidence has been made available at the Preliminary Draft Charging schedule Stage and Draft Charging Schedule Stage in accordance with CIL Regulations

5.13 **Issue 10:** Other issues:

- agricultural/agricultural workers dwellings should be exempt from CIL, this should be made clear in the DCS

Council Response: No additional viability evidence has been submitted to support this exception. Certain types of development will be exempt or eligible for relief from CIL charges as set out in the CIL Regulations 2010 (as amended). Where agricultural tied dwellings meet this criteria they would be exempt from CIL. Some agricultural tenancy schemes may be eligible for social housing relief; however, each case would need to be determined on its merits and in accordance with the provisions of Reg. 49 of the CIL Regulations (2010) (as amended).

6.0 CHANGES TO DRAFT CHARGING SCHEDULE AS A RESULT OF CONSULTATION

- 6.1 Comments received at the DCS stage were considered in regards to the requirements as set out in regards to national legislation, CIL Regulations (as amended) and the National Planning Practice Guidance. The comments were considered and reviewed by the Council's Development Plans Team. Following review of the comments received the Council are proposing no modification to the CIL DCS. The council considers the DCS has been prepared in accordance with CIL regulatory requirements and the proposed rates in the strike an appropriate balance between the desirability of funding infrastructure required to support the development of the District and the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across the District. The Draft Charging Schedule will be submitted for independent examination, in due course.

APPENDIX 1 - List of specific and general bodies and persons the Council invited to make representations.

SPECIFIC CONSULTEES

- Airedale NHS Foundation Trust
- Bradford & Airedale Teaching Primary Care Trust
- Bradford Hospitals NHS Trust
- Bradford Community Health Trust
- British Telecom
- EE
- Historic England
- C/o National Grid
- Environment Agency
- Highways England
- Natural England
- Network Rail
- NHS Airedale, Wharfedale and Craven Clinical Commissioning Group
- NHS Bradford City and Bradford Districts Clinical Commissioning Group
- NHS Property Services Ltd
- Telewest Communications
- The Coal Authority
- Three
- Vodafone & O2
- West Yorkshire Police Crime Prevention
- West Yorkshire Police
- Yorkshire Water

SPECIFIC CONSULTEES – adjoining Planning Authorities

- Borough of Pendle Council
- Calderdale Metropolitan Borough Council
- City of Wakefield M D C
- Craven District Council
- Harrogate District Council
- Kirklees Metropolitan Council
- Lancashire County Council
- Leeds City Council
- North Yorkshire County Council

SPECIFIC CONSULTEES – Town and Parish Councils within Bradford District

- Addingham Parish Council
- Baildon Town Council
- Bradford Trident Community Council
- Burley Parish Council
- Clayton Parish Council
- Cullingworth Parish Council
- Denholme Town Council
- Harden Parish Council
- Haworth, Cross Roads & Stanbury Parish Council
- Ilkley Parish Council
- Keighley Town Council
- Menston Parish Council
- Oxenhope Parish Council
- Sandy Lane Parish Council
- Silsden Town Council
- Steeton with Eastburn Parish Council
- Wilsden Parish Council
- Wrose Parish Council

SPECIFIC CONSULTEES – Neighbouring Town and Parish Councils

- Bradleys Both Parish Council
- Cononley Parish Council
- Cowling Parish Council
- Denton Parish Council
- Draughton Parish Council
- Drighlington Parish Council
- Farnhill Parish Council
- Gildersome Parish Council
- Glusburn and Cross Hills Parish Council
- Laneshaw Bridge Parish Council
- Middleton Parish Council
- Nesfield with Langbar Parish Council
- Otley Town Council
- Sutton-in-Craven Parish Council
- Trawden Forest Parish Council
- Wadsworth Parish Council
- Weston Parish Council

GENERAL CONSULTEES – Local Organisations

- 3rd Queensbury Guides
- Able All
- Activity and Recreation Centre
- Advocacy Peer Support Group for Disabled People
- Aire Rivers Trust
- Airedale Partnership
- Aldersgate Parent / Toddler Group
- All Saints Landmark Centre
- Allerton Community Association
- Anand Milan Centre
- Anchor Housing Association
- Apperley Bridge Development Residents Association
- Attock Community Association
- Baildon Community Council
- Baildon Community Link
- Baildon Friends of the Earth
- Baildon Moravian Church
- Baildon Residents Against Inappropriate Development
- BANDAG
- Bangladeshi Community Association - Bradford
- Bangladeshi Community Association - Keighley
- Bankfoot Partnership
- Bedale Centre
- Ben Rhydding Action Group / Save Us Pub
- Ben Rhydding Green Belt Protection Group
- Bierley Community Centre
- Bierley Community Association & Bethel Community Church
- Bingley CVS
- Bingley Civic Trust
- Bingley Labour Party
- Bingley Branch Labour Party
- Black Mountain Millennium Green/Brunel Community Association
- Black Women's Support Project
- Bolton Villas HUB Project
- Bolton Woods Community Association
- Bolton Woods Community Centre
- Bracken Bank & District Community Association (Sue Belcher Centre)
- Bradford Alliance on Community Care
- Bradford & District Coalition of Disabled People
- Bradford & Ilkley College
- Bradford & Northern Housing Association
- Bradford and District Association of Deaf People
- Bradford Association of Visually Impaired People & Centre for Deaf People
- Bradford Botany Group
- Bradford Breakthrough Ltd
- Bradford Cathedral
- Bradford City Centre Residents Association
- Bradford City Farm Association Ltd
- Bradford Community Environment Project
- Bradford CVS
- Bradford Disability Services
- Bradford Disability Sport & Leisure
- Bradford District Senior Power

- Bradford East Area Federation
- Bradford Friends of the Earth
- Bradford Joint Training Board
- Bradford Khalifa Muslim Society (Heaton Community Centre)
- Bradford Lesbian and Gay Youth
- Bradford Night Stop
- Bradford Older People's Alliance
- Bradford Ornithological Group
- Bradford Ramblers Association Group
- Bradford Retail Action Group
- Bradford South & West Live at Home Scheme
- Bradford Urban Wildlife Group
- Bradford Youth Africa
- Braithwaite & North Dean Action Group
- Braithwaite People's Association
- Buttershaw Christian Family Centre
- Cafe West
- Canterbury Youth and Community Centre
- Carlisle Business Centre
- Cathedral Centre Project
- CBMDC - Strategic Disability Partnership
- Checkpoint / Bradford West Indian Community Centre Association
- Claremont Community Trust
- Clarke Foley Centre
- Clayton Village Hall Community Centre
- CNet
- Colin Appleyard
- Community Service Volunteers
- Communityworks
- Cottingley Community Association
- Cottingley Cornerstone
- Crossflats Village Society
- DDA Task Team
- Delius Arts and Cultural Centre
- Denholme Community Association
- Denholme Residents Action Group (DRAG)
- Dial Bradford
- Disabled Peoples Forum
- Drovers Way Residents Group
- East Bierley Village Association
- Eccleshill Youth And Community Association Ltd
- Eldwick & Gilstead Horticultural Society
- Eldwick Village Society
- Eldwick Memorial Hall Trust
- CBMDC - Environment Partnership
- Equity Partnership - Bradford LGB Strategic Partnership
- Fagley Lane Action Committee
- Fagley Tenants & Residents Association
- Fagley Youth and Community Centre
- Forster Community College
- Friends of Buck Wood
- Friends of Ilkley Moor
- Friends of Pitty Beck
- Friends of The Gateway
- Frizinghall Community Centre
- Girdlington Action Partnership
- Gilstead Village Society
- Girdlington Community Association
- Goitside Regeneration Partnership
- Grange Interlink Community Centre
- Greenhill Action Group
- Greenwood Youth and Community Association
- Hainworth Wood Community Centre
- Harden Village Society
- Haworth & Oxenhope District Bridleways Group
- Haworth Community Centre
- Haworth Village Trust
- Hazel Beck Action Group
- Heaton St Barnabas Village Hall
- Heaton Woods Trust
- Highcroft Youth Centre
- Highfield Community Centre
- Highfield Healthy Lifestyle
- Holme Christian Community
- Holme Church / Holme Christian Community
- Holme Wood & Tong Partnership Board
- Hopes Centre
- Idle Cricket Field Company Ltd
- Ilkley CVS
- Ilkley Design Statement Group
- Ilkley Grammar School
- Incommunities
- Inspired Neighbourhoods
- lyss Localities West
- Karmand Community Centre
- Keighley & Worth Valley Railway Preservation Society

- Keighley Association Women's and Children's Centre
- Keighley College
- Keighley Disabled People's Centre
- Kirkland Community Centre
- Labrys Trust
- Laisterdyke Trinity Community Centre
- Leeds Bradford 20-30's Ramblers Group
- Let Wyke Breathe
- Lidget Green Community Partnership
- Light of The World Community Centre
- Long Lee Village Hall
- Low Moor Local History Group
- Lowerfields Primary School
- Manningham Community Development Centre
- Manningham Mills Community Association
- Margaret McMillan Adventure Playground Association
- Marshfield Community Association
- Masts
- Menston Action Group
- Menston Cares
- Menston Community Association
- Micklethwaite Village Society
- Millan Centre
- Mobility Planning Group
- National Media Museum
- Newton Street Day Centre
- North Community Centre
- North East Windhill Community Association
- Oakdale Residents Association
- Oakenshaw Residents' Association
- Oakworth Village Society
- Odsal Residents Association
- Oxenhope Social Club
- PACT
- Pakistan Community Neighbourhood Association
- Pan African Arts and Cultural Group
- Parkside Community Centre
- Plevna Area Resident's Association
- Polish Community Centre - Friday Group
- Princeville Community Association
- Queensbury Community Centre
- Queensbury Community Programme
- Ravenscliffe & Greengates Community Forum
- Ravenscliffe Community Association
- Ravenscliffe Youth Centre
- Rockwell Centre
- Royds Advice Service
- Royds Community Association
- Ryecroft Community Centre
- St John the Evangelist Church
- St John's Luncheon Club
- St Christopher's Youth Project
- St Francis Village Hall / St Peters PCC
- St Mary's New Horizons Care in the Community
- St Oswald's West End Centre
- Saltaire Village Society
- Saltaire Village Society
- Saltaire Village Society
- Saltaire Village Society
- Salvation Army - Holmewood
- Sangat Community Association
- Scholemoor Beacon
- Scholemoor Community Association
- Sedbergh Youth & Community Centre
- Sensory Needs Services
- Shipley and Bingley Voluntary Services - Bingley branch
- Shipley College Library
- Shipley Constituency Area Panel Advisory Group (SCAPAG)
- Shipley CVS
- Shipley Golf Club
- Shop Mobility
- Shree Krishna Community Centre
- Silsden Town Action Group
- Sleningford Area Residents Association
- South Bradford Community Network
- Southmere Primary School
- South Square Centre
- Springfield Youth And Community Centre
- Stockbridge Neighbourhood Development Group
- Sutton Community Association
- Tesco Stores Ltd
- The Bronte Society
- The Bronte Society

- The Girington Centre
- The Khidmat Centre
- The Kirkgate Centre
- The St Hugh's Centre
- The Vine Trust
- Thornbury Centre
- Thornbury Youth Association
- Thornton Community Partnership
- Thornton Moor Windfarm Action Group
- Thorpe Edge Community Forum & RCDP
- Thorpe Edge Community Project
- Throstle Nest RDA Group
- Tong Village Community Association
- Tong - & Holme Wood Parochial Church Council
- Tong & Fulneck Valley Association
- Touchstone Project
- Transport 2000
- University of Bradford
- Visual Disability Services
- West Central Area District Federation Tenants & Residents
- Wharfedale & Airedale Review Development
- Wilsden Village Hall
- Windhill Community Centre
- Woodhouse & Springbank NF
- Woodlands Cricket Club - Oakenshaw
- Woodside Action Group
- Wyke Armature Rugby League Club
- Wyke Christian Fellowship
- Wyke Community And Children's Centre Ltd
- YMCA - City of Bradford

OTHER CONSULTEES –

- A A Planning Services
- A Furness
- Addingham Civic Society
- Age Concern
- Aggregate Industries UK
- Ainscough Strategic Land
- Aireborough Planning Services
- Aldersgate Estates Ltd
- Al-Farouq Associates
- Allison & MacRae Ltd
- Alyn Nicholls and Associates
- Alzheimers Society
- Ancient Monuments Society
- Antony Aspbury Associates
- Archi-Structure - A Al-Samarraie
- Arrowsmith Associates
- Arts Team
- ASHLAR stone products
- Aspinall Verdi
- Associated Waste Management Limited
- B K Designs
- Baildon Civic Society
- Banks Long & Co
- Banks Renewables
- Barker & Jordan Architects
- Barrat Homes (Northern)
- Barratt & David Wilson Homes Yorkshire West
- Barton Wilmore
- Beckwith Design Associates
- Bedminster International
- Bellway
- Belmont Design Services
- Bingley Civic Trust
- Bioregional Quintain Developments
- Birks Royd Stone Ltd
- BJ Design Services
- Blue Room Properties
- Bowman Riley Partnership
- Bradford Chamber of Commerce & Industry
- Bradford Civic Society
- Bradford District Chamber of Trade
- Bradley Natural Stone Products
- Bradley Stankler Planning
- Brewster Bye Architects
- Brooke Properties
- Brookhouse Group
- Brother Investments (Yorkshire) Ltd
- Burnett Planning & Development
- Butterfield Signs Limited
- CABA
- Caddick Development
- Cala Homes Yorkshire
- Calder Architectural Services Limited
- Campaign for Real Ale
- Canal River Trust
- Carter Jonas
- CEMEX UK Operations

- Chatsworth Settlement Trustees – Bolton Abbey
- Checkley Planning
- Chris Eyres Design
- Chris Thomas Ltd
- CJS Designs
- Clayax Yorkstone Ltd
- Clear Designs
- CLR Architects
- Colas Ltd
- Combined Masonry Supplies
- Commercial Developments Projects Limited
- Commercial Estates Group
- Contract Services
- Council for British Archaeology
- Council For Mosques
- Countryside Properties (Northern) Ltd
- CPRE Bradford District
- CPRE West Yorkshire
- Craven Design Partnership
- Cunningham Planning
- Dacres
- Dacres Commercial
- Dales Design And Developments
- Darrington Quarries Ltd
- David Beighton Architects
- David Hill LLP
- David R Bamford & Associates
- Deloitte
- Depol Associates
- Design Council Cabe
- Dev Plan
- Dialogue Communicating Planning
- Dickman Associates Ltd
- Diocesan Board of Finance
- Directions Planning Consultancy
- DJ Richards
- DLA Architecture
- DLP Planning Consultants
- Dolmens
- Donaldsons
- DPDS Consulting Group
- Dr H Salman
- Drivers Jonas
- DTZ
- Dunlop Haywards Planning
- E&M Batley Chartered Architects & Surveyor
- Eddisons Commercial
- EnergieKontor
- Ennstone Johnstone
- Eric Breare Design
- Eye 4 Design
- F And W Drawing Services
- F M Lister & Son
- F S K Architectural Services
- Fairhurst
- Farrell and Clark
- Firebird Homes
- First
- First Bradford
- Firstplan
- Forestry Commission
- Foresight Bradford
- Forward Planning & Design
- Four Square Drawing Services
- Fox Land & Property
- G L Hearn Property Consultants
- G R Morris Town Planning Consultant
- G Sutton
- G W P Architects
- GA Sorsby - Graphic Architecture
- George E Wright
- George F White
- George Wimpey Northern Yorkshire Ltd
- George Wimpey West Yorkshire Ltd
- George Wright
- GL Hearn
- Gladman Developments
- Golden Cross House
- Goldfinch Estates Ltd
- GP Planning And Building Services
- Gregory Properties
- Hackney Carriage Proprietors Association
- Hainworth Shaw Quarries
- Hallam Land Management Limited
- Halliday Clark
- Halton Homes
- Ham Group
- Hanson UK
- Hard York Quarries Ltd
- Harrom Homes
- Hartley Planning Consultants
- Healy Associates
- Heritage Planning Design
- Holdgate Consulting
- Home Builders Federation
- How Planning
- Hurstwood Group
- Husband and Brown Limited
- Iain Bath Planning
- ID Planning
- IHC Planning
- Ilkley Civic Society

- Indigo Planning
- Inland Waterways Association
- Islamic Relief
- J C Redmile
- J G Nolan
- J O Steel Consulting
- J R Wharton Architect
- J S Wright
- J Slater
- Jacobs
- Janus Architecture
- Jeff McQuillan Consulting
- Jeff Redmile
- Jefferson Sheard Architects
- Jennings Nicholson Associates
- John Thornton Chartered Architect
- Jones Day
- Jones Lang LaSalle
- Joseph Rowntree Charitable Trust
- Just West Yorkshire
- JWPC Limited
- Keighley Community Transport
- Keighley Local Enterprise Agency
- Keighley Voluntary Services
- Kelly Architectural Design
- KeyLand Developments
- Khawaja Planning Services
- Kirkwells - Town Planning & Sustainable Development Consultants
- Lafarge Aggregates & Concrete UK
- Lambert Smith Hampton
- Landtask
- Langtree
- Leeds / Bradford International Airport
- Leeds Friends of the Earth
- Leeds Gypsy and Traveller Exchange
- Leith Planning Ltd
- Linden Homes
- Littman Robeson
- M & G Stone Ltd
- M & M Stone
- Malcolm Bayliss
- Malcolm Scott Consultants
- Mark Wogden Architect
- Martin Smith Designs
- Martin Walsh Associates
- McCarthy & Stone
- McGinnis Development
- Metro
- Michael Beaumont
- Michael Hall Associates
- Michael Hudson
- Midgeham Cliff End Quarry Ltd
- Miller Homes Limited – Yorkshire
- MNB Partnership
- Mobile Operators Association
- Morley Borough Independents
- MSS Architectural Design Services
- Myers Group
- NAM Programme Manager
- Nathaniel Lichfield & Partners
- National Farmers Union
- National Farmers Union - North East
- National Federation of Gypsy Liaison Groups
- National Trust
- Nature After Minerals (RSPB)
- Nature After Minerals Planning Adviser
- Naylor Hill Quarry
- New Close Farm
- New Horizons
- Newmason Properties
- Nexus Planning Ltd
- NFU North East
- Nook Cottage
- North Country Homes Group Ltd
- Northern Trust
- Npower Renewables
- Nuttal Yarwood and Partners
- Nuttall Yarwood And Partners
- Overgraff Planning Services
- Orion Homes
- P Casey (Enviro) Limited
- P J Draughting Services Ltd
- P M Coote
- P N Bakes Architectural Consultancy
- Parkgate Design
- Parkinson Spencer Refractories Ltd
- Patchett Homes Ltd
- PB Planning Ltd
- PDS
- Peacock and Smith
- Permission Homes
- Peter Brett Associates
- Phillip Summers Groundworks Ltd
- Planning And Design
- Planning Bureau
- Planning Inspectorate
- Planning Matters
- Planning Potential
- Planning Prospects Ltd
- Plot of Gold Ltd
- Prince's Foundation
- Priority Sites Ltd
- Provizion First Architecture

- Purearth PLC
- Quarry Products Association
- Quod
- Ramblers - Lower Wharfedale
- Ramblers Association
- Ramblers Association, Bradford Group
- Rance Booth & Smith
- Randfield Associates
- Rapleys LLP
- Renaissance Planning
- Rex, Procter & Partners
- Robinson Architects
- Rollinson Planning Consultancy
- Rone Design
- Rosedale Draughting Services
- Royal Mail Property Holdings
- Royal Town Planning Institute
- RPS Planning
- RSPB
- RSPB North England Region
- Rural Action Yorkshire
- Rural Solutions Consulting
- Rural Yorkshire
- Russell Stone Merchants
- S M Building Products
- S R Design
- Safer City – Bradford & District
- Sanderson Weatherall
- Savills
- Schofield Sweeney Solicitors
- Scott Wilson
- SDS Consultancy
- Sense of Space
- Shipley Stone Sales
- Sibelco UK
- Skipton Properties LTD
- Society for the Protection of Ancient Buildings
- South Pennines Association
- South Pennines Packhorse Trail Trust
- Spawforth Planning Associates
- Sport England
- SSA Planning Limited
- Stainton Planning
- Star Keys Estate Agents, Valuers & Surveyors
- Stephen F Walker
- Steve Hesmond Halgh & Associates
- Stocksfield Construction Ltd
- Stone Federation Great Britain
- Strategic Services
- Strutt & Parker
- SWG Planning Services
- Taylor Wimpey UK Limited
- The Abbeyfield Society
- The Arley Consulting Company Ltd
- The British Aggregates Association
- The British Horse Society
- The Courthouse Planning Consultancy
- The Craven Trust
- The Design Works
- The Drawing Board (UK) Ltd
- The Emerson Group
- The Garden History Society
- The Georgian Group
- The Green Mineral Company
- The Lawn Tennis Association
- The Moravian Manse
- The Planning Bureau Ltd
- The Salvation Army
- The Theatres Trust
- The Twentieth Century Society
- The Victorian Society
- The Woodlands Trust
- Thomas Eggar
- Thomas Eggar
- Tony Plowman
- Tribal MJP
- Turley Associates
- Turner Associates
- Urban Splash
- Vernon and Co
- Vincent and Goring Ltd
- Vista Environmental Limited
- VJ Associates

- W E Leach (Shipley) Ltd
- Walker Morris
- Waller and Partners
- Walton & Co
- Watson Batty
- Webb Seeger Moorhouse Partnership Limited
- West Yorkshire Archaeology Advisory Service
- West Yorkshire Ecology
- West Yorkshire Passenger Transport Executive & Authority
- Westfield Shoppingtown Ltd
- White Young Green
- White Young Green Planning
- WHP Wilkinson Helsby
- William Walker Partnership
- Woodcrown Ltd
- Woodhall Planning & Conservation
- Working Architects Co-Op Limited
- Yorkshire Aggregates Ltd
- Yorkshire Gardens Trust
- Yorkshire Greenspace Alliance
- Yorkshire Riding Centre
- Yorkshire Union of Golf Clubs
- Yorkshire Wildlife Trust
- Zero Architecture Ltd

NOTIFICATIONS – those individuals and organisations requesting inclusion in consultation

Additional to those organisations listed above there were 1524 individual notifications sent out to interested parties and organisation who had previously requested to be included in Local Plan consultations and 17 to individuals who had previously responded to the CIL Primary Draft Charging Schedule stage. These mainly consisted of local residents from the District.

Table of numbers consulted as at 28/07/2015	
Form of Consultation	No. consulted
SPECIFIC CONSULTEES	96
GENERAL CONSULTEES – LOCAL ORGS	268
OTHER CONSULTEES & AGENTS	378
BRADFORD COUNCILLORS & MP'S	95
NOTIFICATION REQUESTS	1524
ADDITIONAL CONSULEES THAT PREVIOUSLY COMMENTED AT CIL PDGS STAGE	17
TOTAL	2393

Appendix 2 – Statement of Representation Procedure

City of Bradford Metropolitan District Council Community Infrastructure Levy

The Community Infrastructure Regulations 2010 (as amended)

NOTICE OF CONSULTATION ON THE COMMUNITY INFRASTRUCTURE LEVY- DRAFT CHARGING SCHEDULE AND STATEMENT OF THE REPRESENTATION PROCEDURE

Under Section 212 of the Planning Act 2008 (as amended by Section 114 of the Localism Act 2011), the City of Bradford Metropolitan District Council (the Council) intends to submit a Community Infrastructure Levy (CIL) Draft Charging Schedule for Examination.

Notice is hereby given in accordance with the above Regulations that the Council has published the CIL Draft Charging Schedule and that following consultation it proposes to submit this document for independent examination.

The following details accompany consultation on the CIL Draft Charging Schedule documents as required by Regulation 16 and 17 of the above Regulations 2010 (as amended)

Title of document	Community Infrastructure Levy: Draft Charging Schedule
Subject Matter	The Community Infrastructure Levy (CIL) is a levy which the Council may charge on new developments in the District. Following consultation in July-September 2015 a CIL Draft Charging Schedule has been prepared for submission for independent examination.
Area covered	City of Bradford Metropolitan District
Consultation period	Written representations are invited during the 8 week consultation period commencing on Monday 14 th December 2015 and concluding at 1.00pm on Monday 8 th February 2016.
Address for representations	Representations must be made in writing and are strongly encouraged to be submitted via the online Representation Form at: www.bradford.gov.uk/planningpolicy Representations may be submitted electronically or in writing via E-mail to: planning.policy@bradford.gov.uk . Post to: Development Plans City of Bradford Metropolitan District Council 2 nd Floor South Jacobs Well Nelson Street Bradford BD1 5RW
Notification of Examination	Representations may request the right to be heard by the examiner and may be accompanied by a request to be notified at a specified address of any of the following—

	<ul style="list-style-type: none">(i) that the Draft Charging Schedule has been submitted to the examiner(ii) the publication of the recommendations of the examiner and the reasons for those recommendations, and(iii) the approval of the charging schedule by the charging authority.
--	---

Appendix 3 – Press Notice and Local Advertisement Notice

The council issued a press released in December 2015 (below), inviting interested parties to comment on the CIL Draft Charging Schedule.

“People are invited to have their say over the coming weeks on a series of Local Plan documents being drawn up by Bradford Council.

Public consultation is about to begin on several documents including that Bradford City Centre Area Action Plan (AAP), Shipley & Canal Road Corridor AAP, and Bradford District Waste Management Plan Development Plan Document (DPD) as well as the Bradford District Community Infrastructure Levy (CIL).

The consultation starts on Monday 14 December 2015 and lasts until Monday 8 February 2016 for an eight week period.

This is the formal period for representations before the plans are submitted to the Government for independent examination.

The documents plus background material and comment form will be available online at (www.bradford.gov.uk/planning).

Coun Val Slater, Bradford Council Deputy Leader, said: “We want to make sure as many people as possible are fully informed of our plans for the district’s future.”

Bradford Council will be holding drop in exhibitions early next year on the following dates:

6 Jan - Waste Management DPD - Keighley Town Hall, Ground Floor Room 3pm to 6pm.

7 Jan - AAP's Shipley Kirkgate Centre 4pm to 7pm.

8 Jan - Bradford City Centre AAP and Shipley & Canal Road Corridor AAP – Shipley, Kirkgate Centre 4pm to 7pm.

11 Jan - Bradford City Centre AAP and Shipley & Canal Road Corridor AAP - Bradford City Library - space in library available, 3pm to 7pm.

12 Jan - Waste Management DPD - Bradford City Library - space in library available 3pm to 7pm.”

The council issued a CIL Local Advertisement Notice (below) in the Bradford telegraph and Argus on Friday 25th March 2016:

PAGE 38

Friday, March 25, 2016

Announcements

Public Notices

City of Bradford Metropolitan District Council: Notice of Representation on the Bradford Community Infrastructure Levy (CIL)
 –Draft Charging Schedule

Under Section 212 of the Planning Act 2008 (as amended), the Council intends to submit a CIL Draft Charging Schedule for Examination. Notice is given that the council is inviting representations on the Draft Charging Schedule from Friday 25 March 2016 to 5.00pm on 22 April 2016 under Regulation 16 and 17 of the CIL Regulations 2010 (as amended).

In accordance with the Regulations, the council has made available for inspection:

- Bradford Council Community Infrastructure Levy: Draft Charging Schedule
- Relevant evidence to support the CIL Draft Charging Schedule

All of the above documents are available to view on the Council's website at: http://www.bradford.gov.uk/bmdc/the_environment/planning_service/local_development_framework/community_infrastructure_levy_draft_charging_schedule

The CIL Draft Charging Schedule and supporting documents are available for inspection at the following Council Offices (Mon-Thurs 9am-5pm; Fri 9am-4.30pm) and at the main local libraries (Mon-Fri 9am-7pm; Sat 9am-5pm):

- Main Council Offices: Planning Reception Jacobs Well, Shipley Town Hall, Kelghley One Stop Shop Town Hall, Ilkley Town Hall ("By appointment only – First Thursday of the month)
- Main Local Libraries: Bradford City Library, Bingley Library, Kelghley Library, Ilkley Library

Representations may be submitted electronically via e-mail to planning.policy@bradford.gov.uk or in writing to: Development Plans, City of Bradford Metropolitan District Council, 2nd Floor South Jacobs Well, Nelson Street Bradford BD1 5RW

Any organisation or individual may request the right to be heard by the examiner. This request must be submitted in writing and received within the specified consultation period. Representations may also be accompanied by a request to be notified, at a specified address, of any of the following:

- That the Draft Charging Schedule has been submitted to the examiner in accordance with Section 212 of the Planning Act 2008.
- The publication of the recommendations of the examiner and the reason for these recommendations, and
- The approval of the Charging Schedule by the Council.

For further information please contact the Development Plans Group on (01274) 437471 or email planning.policy@bradford.gov.uk

Announcements

Public Notices

City of Bradford Metropolitan District Council Planning Applications requiring advertisement under the Town & Country Planning (Development Management Procedure) Order 2015 Affects setting of Listed Building

16/01766/FUL Church Hall St Stephens Church Donishorpe Street BD5 7BX. **16/01856/FUL** Pelican House 10 Currier Street BD1 5BA. **Affects Setting of Listed Building & within Conservation Area 16/01562/FUL** York House Upper Piccadilly BD1 3PD. **16/01638/FUL** 544 Great Horton Road BD7 3HG. **Listed Building Consent 16/01552/LBC** 25 Hailfield Road BD1 3RP. **16/01639/LBC** 544 Great Horton Road BD7 3HG. **16/01734/LBC** 9 Titus Street Salthouse BD18 3JU. **16/01857/LBC** Pelican House 10 Currier Street BD1 5BA. **16/01888/LBC** Lane Close Mills Bartle Lane. **Major Development 16/01758/MAF** Former 7-9 Oak Avenue BD8 7AQ. **16/01827/VOC** Land Ex Solaglass Works Ripley Road BD4 7EX. **Within Conservation Area 16/01317/FUL** 1 Jasper Street BD10 8NQ. **16/01655/FUL** The Persian Restaurant 368 Little Horton Lane BD5 0NB. **16/01746/HOU** 4 Wilmer Road BD9 4DX. **16/01755/MAF** Former 7-9 Oak Avenue BD8 7AQ. **16/01851/FUL** 30 North Parade BD1 3HZ. **16/01860/HOU** 31 Heaton Grove BD9 4DZ. **16/01879/FUL** 14 Oak Lane BD9 4PX. View & comment electronically at www.bradford.gov.uk/planning or at Jacobs Well & Kelghley receptions. Representations deadline: 15/04/2016

We are... effective

60% of people have acted on advertising in local newspapers, with 51% of people visiting a shop due to an advert.*

Take advantage of these impressive statistics by promoting your business in the Telegraph & Argus, contact us to find out how.

*Loving Local

01274 730000
 Monday-Friday 9.00am-5.30pm
classifiedservices@ngny.co.uk

ROAD TRAFFIC REGULATION ACT 1984 SECTION 14 CITY OF BRADFORD METROPOLITAN DISTRICT COUNCIL ALDERSCHOLLES LANE, THORNTON, BRADFORD

TEMPORARY PROHIBITION OF TRAFFIC (NO 511) ORDER 2016

NOTICE IS HEREBY GIVEN that City of Bradford Metropolitan District Council by reason of works to remove tree branches from overhead powerlines to be executed on or near Alderscholles Lane, Thornton has made the above named Order the effect of which is that no person shall proceed in the length of Alderscholles Lane from its junction with John Lane to its junction with Squirrel Lane, Thornton.

PROVIDED THAT such prohibition shall not extend to emergency vehicles and vehicles being used in connection with the works proposed to be carried out on the said length of road.

Pedestrian access will be maintained at all times.

Alternative routes for vehicular traffic affected by the proposed Order will be available via Lower Kipping Lane, B6145 Thornton Road, A644 Bingley and Denholme, Cragg Lane, Squirrel Lane and vice versa.

The Order comes into operation on 31st March 2016 and remains in force until 1st April 2016 (although the closure can remain in force for up to eighteen months if necessary).

DATED this 25th day of March 2016.

Interim City Solicitor, Legal and Democratic Services, City of Bradford Metropolitan District Council, City Hall, Bradford BD1 1HY

ROAD TRAFFIC REGULATION ACT 1984 SECTION 14 CITY OF BRADFORD METROPOLITAN DISTRICT COUNCIL BALME STREET AND CANAL ROAD, BRADFORD

TEMPORARY PROHIBITION OF TRAFFIC (NO 510) ORDER 2016

NOTICE IS HEREBY GIVEN that City of Bradford Metropolitan District Council by reason of works in underground chambers to be executed on or near Balme Street and Canal Road, Bradford has made the above named Order the effect of which is that no person shall turn right into Balme Street from Canal Road when travelling in a northerly direction.

PROVIDED THAT such prohibition shall not extend to emergency vehicles and vehicles being used in connection with the works proposed to be carried out on the said length of road.

Pedestrian access will be maintained at all times.

Alternative routes for vehicular traffic affected by the proposed Order will be available via Canal Road (unaffected section), Holdsworth Street and Bolton Road and vice versa.

The Order comes into operation on 29th March 2016 and remains in force until 31st March 2016 (although the closure can remain in force for up to eighteen months if necessary).

DATED this 25th day of March 2016

Interim City Solicitor, Legal and Democratic Services, City of Bradford Metropolitan District Council, City Hall, Bradford BD1 1HY

DID YOU KNOW?

79% of all adults shop within 5 miles of their homes. A further 10% shop within 10 miles.

*Sourced from The Newspaper Society

The search for your perfect employee is over.

Get your job vacancies seen:

- More than **50%** of job seekers look to local media to find local employers.
- 72%** of job seekers use local media to keep up-to-date with their local job market.
- 60%** of those job seekers **respond to ads** in their local paper or website.

Book your job ad with us now

Telegraph & Argus

telegraphandargus.co.uk/jobs

Call us now on 01274 705106

Appendix 4 – Plan-it Bradford

Plan-it Bradford is the e-newsletter that keeps interested parties up to date with the latest planning policy news and the progress being made on the Local Plan for the Bradford District. The following article appeared in the November issue 25 of Plan-it Bradford.

Community Infrastructure Levy Preliminary Draft Charging Schedule - Update

A six week public consultation on the Preliminary Draft Charging Schedule ended on 11th September. The Council received 46 responses during the consultation period and these are currently in the process of being reviewed by officers. The Draft CIL Charging Schedule was approved at meeting of Executive on 3rd November 2015 and will be considered at meeting of Full Council on 8th December. The Draft CIL Charging Schedule will then be published for further public consultation in December. All those

customers currently on the Local Plan database will automatically receive a separate notification at the start of this consultation with details of where to find the documents and how to make comments. Once adopted the Bradford District Community Infrastructure Levy (CIL) will be means of collecting funds from development to help contribute towards the funding of infrastructure required to deliver the policies and proposals in Local Plan, including the Core Strategy and other Development Plan Documents. For further information on the Bradford District Community Infrastructure Levy contact Alex Bartle, Planning Officer on alex.bartle@bradford.gov.uk

Appendix 5 – Council’s Web Site

Bradford Council has a web site containing links to all the services provided. The following information page was included in the web site and could be accessed via various links including the Development Plan page and the Council’s main Consultations page.

Community Infrastructure Levy

What is the Community Infrastructure Levy?

The Community Infrastructure Levy (CIL) is a levy which the Council may charge on new developments in the District.

The money raised will help the Council pay for infrastructure such as schools, transport, parks, open spaces and other community facilities required to support new housing and economic development in the District.

CIL Draft Charging Schedule

The Council is consulting on the second stage of introducing a charge on new development - a **Community Infrastructure Levy** - to support the delivery of essential infrastructure across the District.

Public Consultation and Next Steps

Public Consultation –Draft Charging Schedule (December2015–February 2016)

The consultation is focussed on the CIL Draft Charging Schedule. The following supporting evidence base documents are also made available for comment:

- Bradford CIL - Economic Viability Evidence (updated)
- Local Infrastructure Plan Evidence

All of the above documents are available to view on the Council’s website at: www.bradford.gov.uk/planningpolicy from Monday 14th December 2015. A Draft Regulation 123 List, Draft Exceptional Circumstances Policy and Draft Instalments Policy are also available to view.

The CIL Draft Charging Schedule stage consultation documents can be accessed from the bottom of the page. The CIL Residential charging zones map, can viewed from the Interactive map link

The CIL Draft Charging Schedule and supporting documents will also be available for inspection at the following **Council Offices** (Mon-Thurs 9am-5pm; Fri 9am-4.30pm) and at the main **local libraries** (Mon-Fri 9am-7pm; Sat 9am-5pm):

Main Council Offices

- Planning Reception, Jacobs Well, Nelson Street, Bradford, BD1 5RW
- Shipley Town Hall, Kirkgate, Shipley, BD18 3EJ
- Keighley One Stop Shop, Town Hall, Bow Street, Keighley, BD21 3SX
- Ilkley Town Hall, Station Road, Ilkley, LS29 8HA (**By appointment only – First Thursday of the month*)

Main Local Libraries

- Bradford City Library, Centenary Square, Bradford, BD1 1NN
- Bingley Library, Myrtle Walk, Bingley, BD16 1AW
- Keighley Library, North Street, Keighley, BD21 3SX

- Ilkley Library, Station Road, Ilkley, LS29 8HA

Written Representations

To make written representations you can comment using the Online Comment Form, or the paper comment form available upon request. Alternatively you can write a letter or e-mail to the following address. Please ensure that your email or letter is titled 'CIL Draft Charging Schedule Consultation'.

The Council is keen to promote the submission of comments electronically and would encourage anyone with appropriate facilities, such as email, to make their responses in this way.

Please send your completed Comment Form, preferably by email to the Development Plans Group:

Email: planning.policy@bradford.gov.uk.

Where it is not possible to comment using electronic means, representations can be sent via mail to:

**Bradford District Local Plan
City of Bradford MDC
Development Plans Team
2nd Floor (South) Jacobs Well
Manchester Road
Bradford
BD1 5RW**

Hand Delivered to the following planning offices:

**Jacobs Well – Ground floor reception, BD1 5RW
(Mon-Thurs 9am to 5pm, Fri 9am to 4.30pm).**

Please note that representations cannot be treated as confidential and will be made available on the Councils website. It is important to note at this stage that representations may request the right to be heard by the examiner and also to be notified at a specified address of the submission to the examiner, publication of the recommendations of the examiner and reasons for the recommendations and / or the approval of the charging schedule by the council

What happens next?





Once the Council has considered all the representations received, it will submit the Draft Charging Schedule for independent Examination. Where any further changes are made to the Draft Charging Schedule after publication, the council must set these out in a 'statement of modifications' which will be made available for comment before the examination. The Council anticipates adopting the CIL charging rates during 2016.

How can I find out more?

If you have any questions please contact the Development Plans team on 01274 433679 or email planning.policy@bradford.gov.uk.

The Planning Advisory Service website provides further useful information on CIL <http://www.pas.gov.uk/community-infrastructure-levy>

Related Links:

- [CIL Draft Charging Schedule \(1419kb\)](#)
- Interactive Map: CIL Charging zones
- CIL DCS Comment From
-  [CIL Draft Charging Schedule Background Report \(1466kb\)](#)
- Draft Regulation 123 List,
- Draft Exceptional Circumstances Policy
- Draft Instalments Policy
-  [CIL Economic Viability Evidence \(update\) \(6487kb\)](#)
-  [Local Infrastructure Plan - 2015 Update \(5078kb\)](#)
-  [CIL Revised Equalities Impact Assessment \(105kb\)](#)
- CIL PDCS Statement of Consultation
- CIL Statement of Representations Procedure

Appendix 6 – Summary of Representations and Responses

Ref	Name	Organisation	Comment (Summarised by the City of Bradford MDC)	Council's Response
General Support for CIL				
0009	Orton	Burley Parish Council	Burley Parish Council considered the CIL Draft Charging Schedule Consultation document at the Council Meeting on 14 th January 2016 and broadly welcomed the CIL Proposals.	Comment noted.
0010	Batterley	Wilsden Parish Council	Wilsden Parish Council supports the adoption of CIL as the means of managing developer contributions to infrastructure but we do not support aspects of the Draft Charging Schedule.	Comment noted.
0017	Hanson	Menston Parish Council	Menston Parish Council has no objections to the Community Infrastructure Levy Draft Charging Schedule (CIL Regulation 16 & 17).	Comment noted
0020	Brook	Johnson Brook – on behalf of a consortium of house builders and strategic land developers	Generally support the CIL charging regime proposals with the specific exception of the proposed charging rates for Wharfedale	Comment noted
CIL Rates				
0001	Copeland	National Farmers Union	Can you confirm that the CIL rates for agricultural/horticultural activities fall under 'All other uses not cited above - zero rated (£0)?	Agricultural/horticultural uses fall under all other uses not cited above and therefor fall under the £0 CIL rate

0005	Smith	Historic England	<p>Welcome the intention not to charge CIL for A1 retail (other than for Supermarkets of over 2000 sq m) within Bradford City Centre. This will help to ensure that CIL does not discourage further investment into the heart of Bradford. This is an especially important consideration given the changes that have been happening and continue to occur in the retail sector</p>	<p>Comment of support for DCS rate noted</p>
0012	Smith	Local Councillor	<p>1. This proposal seems based on the Bedford proposal, which is in the better areas of the Country which have a larger CIL possible the increase in value of projects will subsidise the areas in their Towns and cities.</p> <p>2. The CIL charges of £100/sq m in Wharfedale, will ensure residents of those areas consider removing themselves from Bradford's control as suggested by MP's in these areas, therefore resulting in a significant loss to Bradford's CIL.</p>	<p>1. CIL rates have been set in relation to economic viability evidence and not policy objectives. The council is proposing variable CIL rates to reflect the different value areas of the District, in accordance with the CIL Regulations and CIL National Planning Practice Guidance (NPPG) based on the recommendations in the CIL Viability Assessment and Addendum.</p> <p>2. Noted. The City of Bradford Metropolitan District Council is a charging authority under CIL Regulations. This issue is outside the remit of the CIL DCS and is not considered relevant to the CIL examination.</p>

0014	Kidman	Local resident	<p>In order to reflect the high costs of infrastructure associated with any housing development in Wharfedale, CIL should be raised to the highest possible levels.</p> <p>This funding (and more) – will be needed to support additional school places, drainage, flood alleviation, road and rail improvements, car parking and health facilities. Most of these services are nearing full capacity now.</p>	<p>The proposed CIL rates are not set to a maximum to allow for a viability buffer– in accordance with the Government’s CIL NPPG (paragraph 20). The proposed CIL rates are considered to strike an appropriate balance between the desirability of funding infrastructure from the levy and the potential impact on the viability of development. The council therefore do not agree CIL rates should be raised to the highest possible level as this would not strike an appropriate balance and could threaten the delivery of development in the area.</p> <p>CIL will help fund infrastructure to support growth, however the CIL is not intended to be the only funding source for infrastructure. Therefore the Council will not be relying solely on CIL receipts for the delivery of infrastructure. Strategic infrastructure issues are identified in the Local Infrastructure Plan (LIP). The approach to infrastructure funding and delivery across the District is out in the Local Plan Core Strategy, which is currently being considered through an Examination in Public.</p>
0016	Pickles	Local resident	<p>1. The proposed CIL rate of £20/sq m is inadequate in Silsden to provide a meaningful contribution towards the £25 million plus infrastructure investment needed in the area, to support any sustainable developments. A Viability addendum has been provided in Dec 2015, which indicates (although the addendum is limited to a small site) that</p>	<p>1. CIL rates have been set in relation to viability evidence. The proposed CIL rates are not set to a maximum to allow for a viability buffer– in accordance with the Government’s CIL NPPG (paragraph 20). The proposed CIL rates are considered to strike an appropriate balance</p>

			<p>considerable headroom is available, to absorb a higher CIL rate and the S106 for education (previously applied) is expected in future to be included in the CIL 123 list.</p> <p>2. The CIL rates needs to truly reflect the infrastructure needs in that community to offset the burden the provision of additional housing will impose. The CIL rates proposed will not deliver the requisite proportion of funding towards infrastructure improvements required to accommodate the new development sites. Where is the short fall in funding to come from if not the CIL?</p> <p>3. It is noted in the revised SHLAA that all sites are ready now for development in Silsden, despite the previous SHLAA indicating a phased pattern of development.</p>	<p>between the desirability of funding infrastructure from the levy and the potential impact on the viability of development.</p> <p>The CIL Viability Addendum indicates an increase in the headroom within Value Area 3 from the original viability assessment. While, it is recognised that this indicates the potential for an increase in the charging rate in this zone, the viability evidence states that given the potential for significant variation in sites across Value Area 3 it is considered that caution should be applied to any increase in the CIL rate to ensure that there is an adequate buffer retained. The viability addendum states residential rates in Charging Zone 3 are considered appropriate as they allow for a viability buffer in accordance with the CIL NPPG (paragraph 20).</p> <p>No additional viability evidence has been provided as part of the representation as to what the appropriate level of CIL or viability buffer should be for this zone.</p> <p>2. CIL rates must be viable and not be set at a level which will put the delivery of development at risk. CIL will help deliver infrastructure to support the development of an area. However, CIL is not intended to be the only source of funding for infrastructure provision. It is</p>
--	--	--	--	--

				<p>therefore not considered appropriate to set CIL rates which reflect total infrastructure costs in an area as the council is required to strike an appropriate balance between the desirability of funding infrastructure from the levy and the potential impact on the viability of development.</p> <p>There are many alternative funding sources for infrastructure other than CIL. The Council has worked in partnership with infrastructure delivery partners, through the preparation of the Local Infrastructure Plan (LIP), which sets out how the Local Plan Core Strategy will be supported by appropriate infrastructure. In addition planning obligations, including S106 and 278 agreements, will remain alongside the CIL to enable developer contributions for infrastructure required to make individual planning applications acceptable in planning terms and mitigate local impacts.</p> <p>The approach to infrastructure funding and delivery across the District is out in the Local Plan Core Strategy, which is currently being considered through an Examination in Public.</p> <p>3. Comment noted. The SHLAA forms evidence for the Local Pan Core Strategy. This is outside the remit of the CIL DCS as the CIL DCS sits alongside but is not part of the Local Plan.</p>
--	--	--	--	---

0016	Pickles	Local Resident	<p>1. Nationally available evidence and comparable areas in the UK, (not only Yorkshire region) indicate a higher level of CIL is viable whilst still maintaining a reasonable profit margin. Indeed this additional headroom possible is identified in both the DTZ documents and those provided in the neighbouring area of Leeds.</p> <p>2. Capability of growth in the region is seriously undermined by the lack of infrastructure investment. To minimise this identified shortfall, growth should be initially directed to be in the less demanding areas first where a lower CIL has been allocated and existing utilities, services are adequate, the higher demand for high infrastructure investment areas should be only considered when the aforementioned areas have been fully developed.</p> <p>3. CIL is a mechanism to allow for pooling making a significant difference rather than, small contributions through S106 to specific areas of need. It is therefore critical it is set at a level which will make a meaningful contribution to support the proposed local development to be fair to both the developer and existing local residents in the spirit of the Localism Act. The proposal does not achieve an appropriate balance.</p> <p>4. Suggest further work is needed to ensure any proposed level for the neighbouring Craven/North Yorkshire areas are compatibility with the rates set for Silsden/Steeton/Eastburn and Addingham.</p>	<p>1. Each charging authority has to set CIL rates based on its own evidence and circumstances. Therefore, despite some differences between Leeds and Bradford CIL rates, the council considers the proposed Bradford CIL rates are appropriate and justified in their own context.</p> <p>The proposed CIL rates are not set to a maximum to allow for a viability buffer– in accordance with the Government’s CIL NPPG (paragraph 20). No additional viability evidence have been provided as part of the representation as to what the level of CIL or viability buffer should be.</p> <p>2. Noted. The CIL DCS is not a plan providing policies for the scale, phasing or location of development. This will be considered through the Local Plan Core Strategy and Allocations Development Plan Document and is outside the remit of the CIL DCS.</p> <p>3. Noted. CIL will help to support the delivery of infrastructure to support the development in the District however; CIL is not intended to be the only source of funding for infrastructure provision. The council consider the proposed CIL rates are justified based on robust evidence in the LIP and viability evidence, and strike an appropriate balance. CIL rates must be viable and not be set at a level which will put the delivery of</p>
------	---------	----------------	---	---

				<p>development at risk. No additional viability evidence have been provided as part of the representation as to what the level of CIL or viability buffer should be.</p> <p>4. In accordance with CIL Regulations the council has consulted with adjoining authorities including Craven District Council, Harrogate District Council and North Yorkshire County Council, as part of the consultation of the CIL DCS and PDCS. Each charging authority has to set CIL rates based on its own evidence and circumstances. The council consider the proposed CIL DCS is based on robust and appropriate evidence and is justified in its own context.</p>
0016	Pickles	Local Resident	The viability of CIL rates in zones 1,2 and 3 in particular should be re-appraised, in particular in areas where large infrastructure investment is needed to underpin sustainable growth	Viability of CIL rates have been assessed through the CIL Viability Assessment and Addendum. The council therefore consider the proposed CIL DCS is based on robust and appropriate evidence and therefore do not agree the rates need to be re-appraised in these areas.
0018	Thompson	Local Resident	1. Bradford Council and its consultants, 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	1. The council consider the proposed CIL DCS is based on robust and appropriate evidence. The CIL NPPG states the council should use an area based approach involving a broad test of viability across the area as evidence to inform the charge. Viability of CIL has been assessed through the CIL Viability Assessment. New build sales values form the basis of viability testing for CIL testing purposes.

			<p>housing but particularly commercial (market value) housing further inflating the Council's expectations regarding the sums that could be raised through CIL. 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</p> <p>2. An accurate assessment of land values needs to be undertaken before setting CIL rates. The proposed CIL rates are not informed by the evidence as the evidence has not been examined.</p> <p>3. 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 house building 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</p>	<p>The viability addendum takes account of changing market conditions since the earlier evidence base was collated and presents revised appraisals based on the most up to date new build sales evidence and build cost information. Details of the residential market evidence on sales values are set out at Appendix A of the DTZ Viability Report. The council consider the proposed CIL rates viable as supported by the CIL viability assessment and addendum.</p> <p>The CIL has been worked up alongside the emerging Local Plan Core Strategy. However the CIL DCS is not a plan providing policies for the scale of development. This will be considered through the Local Plan Core Strategy and Allocations Development Plan Document and is outside the remit of the CIL DCS.</p> <p>2. The CIL Viability Assessment and Addendum have tested viability using a range of site value thresholds intended to be representative of typical net land prices in different parts of the District. Although evidence of transaction data is limited the viability assessment reviewed VOA Property Market reports and consulted land agents, land owners and developers in arriving at the benchmarks used. In accordance with RICS guidance, it has discounted the site value</p>
--	--	--	--	--

				<p>benchmarks to allow for the impact of CIL. It is therefore considered the District wide CIL Viability Assessment provides robust and appropriate evidence to inform the CIL charging rates.</p> <p>3. The council consider the proposed CIL rates viable as supported by the CIL Viability Assessment and Addendum. No viability evidence have been provided as part of the representation as to what the level of CIL or viability buffer should be. The CIL is not a plan providing policies or proposals for the location for growth / development in the District. This is outside the remit of the CIL DCS and will be considered through the Local Plan Core Strategy and Allocations Development Plan Document.</p>
0019	Thomas	The Planning Bureau Ltd	<p>1. The Draft Charging Schedule acknowledges the differences in viability between the different areas of Bradford. This is an approach which has been implemented successfully across several Local Planning Authorities and one which we generally support.</p> <p>2. The Charging Schedule does not differentiate between houses, flats and specialist accommodation for the elderly despite the significant differences between these forms of accommodation. Whilst there is an understandable desire to keep the charging rates as simple as possible the Charging Schedule appears not to acknowledge the very specific viability issues associated with such specialist</p>	<p>1. Comment of support for different charging zones noted.</p> <p>2. The council recognise that NPPF requires objectively assessed housing needs to be met and that the emerging Core Strategy seeks to meet housing needs of all sectors (including those with specialist requirements). Retirement housing will be a relatively small element of the Local plan housing growth strategy, even if this market is expected to increase.</p> <p>The CIL Regulations require consideration to be</p>

			<p>accommodation for the elderly.</p> <p>The CIL Guidance also stresses the importance of this principle to individual market sectors that play an important role in meeting housing need, housing supply and the delivery of the Development Plan, such as specialist accommodation for the elderly. This is detailed in 'Section 2:2:2:6 Can Differential rates be set?' which states:</p> <p><i>'...Charging schedules with differential rates should not have a disproportionate impact on particular sectors or specialist forms of development. Charging authorities should consider the views of developers at an early stage.'</i></p> <p>Where the provision of specialist accommodation for the elderly plays a clear role in meeting housing needs in the emerging or extant Development Plan, as it does in the context of the Bradford Local Plan, by not properly considering the effect of CIL on this form of development the Council would be putting the objective of the Development Plan at risk and thereby contravening Government Guidance.</p> <p>Reference to the NPPF and NPPG in terms of the national planning policy requirements to meet the needs for all types of housing, in particular specialist accommodation for the elderly. ONS statistical data on the ageing demographic profile of the District.</p> <p>In light of the above it is considered of vital importance that</p>	<p>given to the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area and it is considered that the proposed rates in the CIL DCS has achieved this.</p> <p>The impact of CIL on a care home was modelled in the CIL Viability Assessment (June 2015). The conclusion was that this type of development was not viable to bear CIL. Therefore the DCS excludes care homes and other forms of specialist accommodation in the C2 Use Classes Order from CIL charge. The council therefore considers that the proposed DCS as drafted is appropriate.</p> <p>In regards to the viability evidence the council recognise that certain schemes will adopt different inputs to those used within the CIL Viability Assessment. However the council consider that the assumptions used within the CIL viability assessment for residential development generally align with normal figures expected in the majority of developments.</p> <p>The CIL Regulations only allow differentiation by geographical area, intended use and size of development. Distinctions can only be made between intended uses of development if the uses are genuinely different in terms of their physical characteristics and purposes of the use</p>
--	--	--	--	---

			<p>the emerging CIL does not prohibit the development of specialist accommodation for the elderly at a time when there is an existing and urgent need for this form of development and that by not properly assessing this form of development the proposed CIL rate would threaten the delivery of the relevant Local Development Plan.</p> <p>There is an increasing consensus that specialist accommodation for the elderly should not be viewed as an oversight or ‘casualty’ of the CIL regime. This is being borne out via an increasing number of Local Authorities providing separate rates for the different models of specialist accommodation for the elderly and an increasing level of scrutiny from Planning Inspectorate during the Examination of CIL Charging Schedules</p> <p>The viability evidence supporting the CIL DCS is one of a limited number which we have reviewed in the past 12 months which does not appear to test the viability of specialist housing.</p> <p>There is a need to ensure that the supporting viability work for the CIL is actually representative of what is happening in the real market place for all forms of housing, as, if it is not, the adoption of CIL may prevent needed development coming forward.</p> <p>The Council should test the viability of specialist older person’s accommodation (sheltered/retirement housing).</p>	<p>of the land. Differential rates must be set in such a way that they do not grant any selective advantage and should only be based on economic viability evidence.</p> <p>In addition the CIL rates for residential uses proposed have been set below the maximum rates set out in the CIL Viability Assessment and therefore include a significant viability buffer. The CIL Viability Assessment also takes a cautious approach in a number of assumptions, thereby increasing the overall viability buffer which should account for any differences in business models for residential developments.</p> <p>The Council therefore does not consider that there are outstanding reasons to support a differentiation between general residential development and elderly/retirement accommodation in the District.</p> <p>It is considered the District wide CIL Viability Assessment provides robust and appropriate evidence to inform the CIL charging rates.</p>
--	--	--	--	--

0023	Harrison	CLA	<p>Concern the DCS indicates that the residential CIL rate will be levied on rural/agricultural workers dwellings. The Statement of Pre-Submission Consultation and Summary of Representations states that there are exemptions in the CIL Regulations, which include affordable housing and self-build dwellings. Rural/agricultural workers dwellings are not affordable housing as the S106 Agreement will include specific occupancy conditions. Also, in some circumstance, the farmer will construct a dwelling for occupancy by a farm worker thus the self-build exemption eligibility would not be available.</p> <p>The Planning Inspectorate's report to Wigan Council dated 28 August 2015 on their Draft Charging Schedule stated: <i>I also note the clear statement on other exemptions in paragraph 2.9 of the DCS, which should provide the necessary reassurance to those with concerns about how the charge will affect development such as agricultural workers dwellings, alternative forms of social housing and heritage assets.</i></p> <p>Paragraph 2.9 Exemptions and Relief of Wigan's DCS states: <i>Agricultural workers dwellings where they are protected by a planning condition and/or a Section 106 Agreement from open market sale;</i></p> <p>Hope that Bradford MBC will consider including rural/agricultural workers dwellings in their list of exemptions.</p>	<p>CIL regulations allow certain exemptions for affordable housing and self-build housing; however there is no requirement to exempt Rural Agricultural dwellings. If accommodation were being built for rural/agricultural dwellings that met the requirements to qualify as Affordable Housing, CIL would not apply. Likewise CIL would not apply if the dwelling was a self-build development.</p> <p>In regards to viability it is recognised that a home restricted to agricultural worker occupancy will have a lower end value. However, it is important to note that there would be no land cost to such a development. No additional specific viability evidence for rural agricultural housing development in the District has been provided as part of the representation.</p> <p>The Council does not consider that there are justified reasons to support a differentiation between general residential development and rural/agricultural worker dwellings accommodation in the District. The council consider that the CIL rates proposed are justified based on the available evidence and will not threaten the delivery of the relevant Plan as a whole.</p>
0020	Brook	Johnson Brook – on behalf of a	1. The Council state that they have struck an appropriate balance between the desirability of funding infrastructure	1. Support for zones 3 and 4 noted.

		<p>consortium of house builders and strategic land developers</p>	<p>from the levy and the potential impact on viability. We conclude that while the evidence base available is limited and more research is required that there is sufficient market sales and general area viability information available to be able to establish the rates proposed for residential development in zones 3 and 4 with a sufficient degree of confidence.</p> <p>2. The revised proposal for a £5/sq m. charging rate rather than a nil charge in zone 4 is not clearly supported by evidence. While we do not object to this in principle some further evidence is needed to justify this.</p> <p>3. Generally support the proposed residential charging rate for zone 2 but suggest that this is carefully monitored post implementation in terms of the geography of zone 2 and the impact of CIL</p> <p>4. Object to the residential charging rate for zone 1 at £100sq.m consider that this is not fully justified by the limited evidence available and for the reasons set out below including lack of clear infrastructure cost information, balance of expected CIL against other contributions (S106/278) and lower CIL rate of £90sqm in Leeds. Propose a revised rate of £85/sq m.</p> <p>On the limited evidence available we consider that the residential charging rates are appropriate for zones 2-4 but for we consider that a lower charging rate is justified in zone 1. In terms of land values and selling prices the</p>	<p>2. CIL Regulations require the Council to strike an appropriate balance between the desirability of funding infrastructure through CIL and impact on viability of evidence. The DTZ CIL Viability Assessment 2015(paragraph 7.4) states small variations may be capable of justification particularly where they support the principle of achieving a 'balance' between the infrastructure funding need and viability. As set out in the CIL PDCS Background Report July 2015, (paras 5.26 to 5.32) in view of the very small proportion of development costs and large infrastructure funding gap and critical infrastructure issues identified within in the main urban areas, on balance a nominal CIL charge of £5 for residential development is considered justified in the lower value zones. A levy of £5psm is considered a nominal charge which will not realistically put delivery risk.</p> <p>It is therefore considered that there is justification for setting a nominal charge for residential uses for the locations the viability evidence suggests as zero charge. This would not only bring in more CIL revenue overall to help meet infrastructure needs, but would mean that all housing development would contribute to meeting infrastructure requirements and provide local benefits through providing a meaningful proportion to all local communities. The Council</p>
--	--	---	--	--

			<p>Bradford part of Wharfedale is similar to the neighbouring Leeds section of the valley to the east. Leeds have selected a residential charging rate of £90/sq.m. Significant recent residential development has taken place in the Leeds section while this is not the case in the Bradford section. For all of these reasons we consider that a cautious is required to the residential charging rate in zone 1.</p> <p>5. Given the difficulties associated with delivering employment development in the Bradford District we agree with the exclusion of these use classes from the charging schedule</p>	<p>therefore considers that on balance a nominal CIL charge of £5 for residential development is justified in the lower value zones.</p> <p>3. Support for zone 2 noted. The council will monitor and report on CIL in line with CIL Regulations.</p> <p>4. The council consider the proposed CIL DCS is based on robust and appropriate evidence. The CIL NPPG states the council should use an area based approach involving a broad test of viability across the area as evidence to inform the charge. Viability of CIL has been assessed through the CIL Viability Assessment (2015) and Addendum. New build sales values form the basis of viability testing for CIL testing purposes. The viability addendum takes account of changing market conditions since the earlier evidence base was collated and presents revised appraisals based on the most up to date new build sales evidence and build cost information. The council consider the proposed CIL rate for zone 1 viable as supported by the CIL viability assessment and addendum.</p> <p>Each charging authority has to set CIL rates based on its own evidence and circumstances. Therefore, despite some differences between Leeds and Bradford CIL rates, the council considers the proposed Bradford CIL rates are</p>
--	--	--	--	---

				<p>appropriate and justified in their own context.</p> <p>No additional viability evidence has been provided as part of the representation to justify the proposed revised levy rate of £85/sq m. In addition the CIL rates for residential uses proposed have been set below the maximum rates set out in the CIL Viability Assessment and Addendum and therefore include a significant viability buffer. The Viability Assessment also takes a cautious approach in a number of assumptions, thereby increasing the overall viability buffer which should account for any differences in business models for residential developments.</p> <p>5. Comment noted.</p>
0022	Cartwright	Bradford Chamber of Commerce	<p>The Council is still is not listening to the advice of its own advisors who report that housing development in certain areas of the district cannot support a CIL charge, namely Bradford and Keighley. And yet, the Council is continuing with its £5/sq m in these urban areas. This does not make sense. On the one hand the Council is promoting development in these urban areas, yet at the same time imposing a charge on these areas that will affect viability and, therefore, the deliverability of these schemes.</p> <p>In addition, Bradford centre has seen a large number of office buildings converted to flats over the last year or so, which will have a zero CIL payment. It is important that we</p>	<p>CIL Regulations require the Council to strike an appropriate balance between the desirability of funding infrastructure through CIL and impact on viability of evidence. The DTZ CIL Viability Assessment 2015(paragraph 7.4) states small variations may be capable of justification particularly where they support the principle of achieving a ‘balance’ between the infrastructure funding need and viability. As set out in the CIL PDCS Background Report July 2015, (paras 5.26 to 5.32) in view of the very small proportion of development costs and large infrastructure funding gap and critical infrastructure issues</p>

			<p>put new-build housing development on a level playing field.</p>	<p>identified within in the main urban areas, on balance a nominal CIL charge of £5 for residential development is considered justified in the lower value zones. A levy of £5psm is considered a nominal charge which will not realistically put delivery risk.</p> <p>It is therefore considered that there is justification for setting a nominal charge for residential uses for the locations the viability evidence suggests as zero charge. This would not only bring in more CIL revenue overall to help meet infrastructure needs, but would mean that all housing development would contribute to meeting infrastructure requirements and provide local benefits through providing a meaningful proportion to all local communities. The Council therefore considers that on balance a nominal CIL charge of £5 for residential development is justified in the lower value zones.</p>
--	--	--	--	--

0022	Cartwright	Bradford Chamber of Commerce	<p>1. The Council has not taken on board Cushman & Wakefield’s suggestion relating to potential nominal increase in the charge for Zone 3, or to re-draw the boundaries between Zone 3 and 4, or to sub-divide Zone 4 to better reflect the evidence.</p> <p>2. The Chamber is keen to ensure that Bradford remains competitive. It should not set the CIL charge higher than Leeds. The proposed CIL rates for commercial development should be lower in Bradford than Leeds. This approach must be reflected in the housing sector as well. Three of the housing rates for Bradford are higher than the equivalent for Leeds and only one is equal. If the Council continues with this approach, there is a real risk that this will further discourage housing development in Bradford District in favour of Leeds.</p> <p>If the Council consider CIL is necessary, then it is just as necessary to ensure that the level being imposed reflects the evidence. At present, the level proposed for housing development is set too high, making it more difficult to attract investment and secure deliverable schemes. Urge Bradford Council to reconsider the charges to ensure that the city is a viable place to develop.</p>	<p>1. The CIL Viability Addendum indicates an increase in the headroom within Value Area 3 from the original viability assessment. While, it is recognised that this does indicate the potential for an increase in the charging rate in this zone, the viability evidence states that given the potential for significant variation in sites across Value Area 3 it is considered that caution should be applied to any increase in the CIL rate to ensure that there is an adequate buffer retained. The viability addendum states residential rates in Charging Zone 3 are considered appropriate as they allow for a viability buffer in accordance with the CIL NPPG (paragraph 20).</p> <p>2. CIL Regulations state CIL cannot be set in relation to policy objectives. The proposed rates in the CIL DCS have been set in relation to economic viability evidence and not policy objectives. Each charging authority has to set CIL rates based on its own evidence and circumstances. Therefore, despite some differences between Leeds and Bradford CIL rates, the council considers the proposed Bradford CIL rates are appropriate and justified in their own context.</p>
CIL Charging Zones				

0005	Smith	Historic England	Support the intention to put the City Centre within Residential Charging Zone 4. Given the intention of the City Centre AAP to encourage people to live within the City Centre, it is essential that potential developers are not dissuaded from undertaking projects in that area by too high a rate of CIL.	Comment of support noted
0010	Batterley	Wilsden Parish Council	<p>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.</p> <p>The main independent report prepared by DTZ on behalf of the council acknowledges 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.</p> <p>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</p> <p>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</p>	<p>The proposed charging zone boundaries are based on the CIL Viability Evidence (2015). The Charging zones were identified using Land Registry average house prices mapped against postcode areas. The council recognise that there may be local variations in values; however it is considered the district wide viability assessment provides robust and appropriate evidence to inform the charging zones. The council consider that the four charging zones proposed broadly reflect the viability of residential development across the District and avoids undue complexity in setting differential rates for residential development.</p> <p>The CIL Viability evidence includes site specific viability testing. The latest evidence in the Viability Assessment Addendum (2015) retested the site at Crack Lane, Wilsden taking into consideration the representations made by Wilsden Parish Council on the consultation of the PDCS. This indicates a higher level of sales values that was previously assumed. This is consistent with other sites sampled within the mid value</p>

			<p>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 in the representation).</p> <p>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.</p> <p>In summary we consider 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.</p> <p>We believe the way that the way the Viability Assessment gathers evidence to support this the proposed charging zone boundaries, 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.</p> <p>If the Charging Zone boundaries are not completely reviewed and refined the developer contributions towards</p>	<p>zone (Value Area 3). The revision to this site specific appraisal supports the findings of the area wide viability analysis which indicate an increase in the headroom within Value Area 3 to an average of £63 per sq m, from £50 per sq m in the original viability assessment. However, while it is recognised that this does indicate the potential for an increase in the charging rate in this location, the viability evidence states that given the potential for significant variation in sites across Value Area 3 it is considered that caution should be applied to any increase in the CIL rate to ensure that there is an adequate buffer retained.</p> <p>Based on the need to avoid undue complexity in setting differential rates (as required by the CIL NPPG Paragraph: 022) and the need to ensure an adequate viability buffer in accordance with the CIL NPPG (Paragraph: 020) the council consider the proposed residential charging zone boundaries and CIL rate for Charging Zone 3 appropriate and justified.</p>
--	--	--	--	--

			infrastructure, both district wide and to individual communities, will be dramatically reduced to the detriment of everyone	
0015	Corcoran	Silsden Town Council	<p>The specific areas relating to each charging band in Silsden are not specifically defined so it is not possible to assess the effect on this community or whether it will affect the deliverability of individual sites.</p> <p>Without a specific identification of where the CIL bands are applied in Silsden and the specific site allocations are to be made we cannot comment on the applicability of the CIL charge and its effect on the development of our community.</p>	<p>The CIL charging zones are defined on CIL Draft Charging Zone Map on page 12 of the CIL DCS. The zones are shown on an O/S map in accordance with the CIL Regulations. The council have also provided an interactive GIS based map on the CIL DCS consultation webpage which can be viewed in more detail at different scales.</p>
0016	Pickles	Local Resident	<p>The revised map is still not clear on which sites are at which rate –suggest sub maps of each area provided to back-up the main area map.</p>	<p>The CIL charging zones are defined on CIL Draft Charging Zone Map on page12 of the DCS. The zones are shown on an O/S map in accordance with the CIL Regulations. The council have also provided an interactive GIS based map on the CIL DCS consultation webpage which can be viewed in more detail at different scales.</p>
Spending CIL				

0003	Shaw	Local resident	<p>The CIL seems to be an improvement as S106 was somewhat arbitrary and negotiable, but at least the money raised was spent locally. As I understand only a proportion of CIL is to be spent on local infrastructure and the major part becoming income of the Metropolitan District. Members of Parliament have recently drawn attention to the large proportion of the rateable income of Bradford which is levied in Ilkley and Wharfedale. This reflects a feeling of frustration, that Ilkley does not receive a fair share of the Metropolitan Districts expenditure.</p> <p>Suggest that the levy be spent on infrastructure in the ward or wards affected by the development, at the discretion of the ward councillors and parish Council where one exists.</p>	<p>The CIL Regulations require a proportion of CIL receipts to be passed to local communities where development has taken place. The neighbourhood portion is set out in the CIL Regulations. Local communities will receive 15% of the neighbourhood portion of CIL recipes (or 25%, if a neighbourhood plan or neighbourhood development order has been made).</p> <p>The Council has not yet made any decisions on any further local ring fencing. This is outside the remit of the Charging Schedule itself. The council will consider these comments in relation to any future decision on local ring-fencing of CIL monies following the adoption of CIL.</p> <p>The monies raised other than the neighbourhood portion will go into a central pot to deliver infrastructure across the District. The council must spend the levy on infrastructure needed to support the development of their area, and decide what infrastructure is needed. The Regulation 123 list sets out what CIL monies may fund.</p>
------	------	----------------	---	---

0006	Brown	Local resident	<p>A much high percentage should go to the area where the development is to take place to ensure that there is funding for all new facilities that would be required as a result of building.</p> <p>Suggest a minimum of 60% and 80% for areas with neighbourhood plans.</p>	<p>The CIL Regulations require a proportion of CIL recipes to be passed to local communities where development has taken place. The neighbourhood portion is set out in the CIL Regulations.</p> <p>The Council has not yet made any decisions on any further local ring fencing. This is outside the remit of the Charging Schedule itself. The council will consider these comments in relation to any future decision on local ring-fencing of CIL monies following the adoption of CIL.</p>
007	Emmott	Ilkley Design Statement Group	<p>Object to the proposed limit on the income from (CIL) being spent in the area/ward where the related development is taking place. The proposed CIL states a minimum of 15% which is increased to 25% where a Neighbourhood Plan is in place.</p> <p>It is appreciated the Council would have the discretion to increase these minimum figures but it is felt the minimum figures suggested are too low to reflect the expenditure on the infrastructure necessary and required in Ilkley to support new housing development as set out in the Core Strategy (+1000 new homes).</p> <p>Suggest these minimum figures should be increased to at least 60% and 80% respectively. Ilkley is proposed to be in its own Zone 1 – the most expensive zone – so clearly the Council already recognises that Ilkley has a unique position</p>	<p>The CIL DCS does not place a limit on spending of CIL recipes. The CIL Regulations require a proportion of CIL recipes to be passed to local communities where development has taken place. The neighbourhood portion is set out in the CIL Regulations. The council therefore do not consider the objection is relevant to the CIL DCS.</p> <p>The Council has not yet made any decisions on any further local ring fencing. This is outside the remit of the Charging Schedule itself. The council will consider these comments in relation to any future decision on local ring-fencing of CIL monies following the adoption of CIL.</p>

			in the Metropolitan District.	
0012	Smith	Local Councillor	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.	<p>The CIL Regulations require a proportion of CIL recipes to be passed to local communities where development has taken place. The neighbourhood portion is set out in the CIL Regulations. Local communities will receive 15% of the neighbourhood portion of CIL recipes (or 25%, if a neighbourhood plan or neighbourhood development order has been made).</p> <p>The monies raised other than the neighbourhood portion will go into a central pot to contribute to infrastructure across the District. The council must spend the levy on infrastructure needed to support the development of their area, and decide what infrastructure is needed. The Regulation 123 list sets out what CIL monies may fund.</p>
0017	Hanson	Menston Parish Council	The Parish Council would like to include a condition that CIL raised from any qualifying work in Menston is allocated for the benefit of Menston alone.	<p>The CIL Regulations require a proportion of CIL recipes to be passed to local communities where development has taken place. The neighbourhood portion is set out in the CIL Regulations. Local communities will receive 15% of the neighbourhood portion of CIL recipes (or 25%, if a neighbourhood plan or neighbourhood development order has been made).</p> <p>The Council has not yet made any decisions on any further local ring fencing. This is outside the remit of the Charging Schedule itself. The council</p>

				will consider these comments in relation to any future decision on local ring-fencing of CIL monies following the adoption of CIL.
Local Infrastructure Plan evidence (LIP)				
0002	Rios	Highways England	<p>Comments on the Local Infrastructure Plan (LIP) – 7/1/16 In September 2015 we commented on the summer 2015 update of the Local Infrastructure Plan (LIP) that forms part of the evidence base supporting the Local Plan and the Community Infrastructure Levy (CIL) Charging Schedule. The December 2015 Update of the LIP issued to support consultation on the CIL Draft Charging Schedule does not appear to fully reflect our comments. We have therefore updated our comments and submit them for inclusion in the LIP and the Infrastructure Schedule.</p> <p>Highways England also provided an Infrastructure Schedule which should be referred to. This table is intended to replace the entries under ‘Transport (Strategic Road Network)’ in the Infrastructure Schedule in the Local Infrastructure Plan Update (June 2015)</p>	<p>The Council's Local Infrastructure Plan (LIP) sets out the strategic infrastructure requirements in relation to delivering growth in the District. This has helped identify an infrastructure funding gap and inform the Draft Regulation 123 List.</p> <p>The LIP will be updated on a regular basis in consultation with key partners, local communities and infrastructure providers. The Council will consider these comments and updated Local Infrastructure Schedule as part of the LIP update.</p>

0002	Rios	Highways England	<p>Highways England has a number of planned improvements to the strategic road network serving Bradford funded as part of the government’s Road Investment Strategy (RIS). The schemes are intended to provide additional capacity at congested locations. These schemes should be included in the Infrastructure Delivery Schedule in the LIP. The RIS schemes of particular relevance to Bradford are as follows:</p> <ul style="list-style-type: none"> • M62/M606 Chain Bar: • M62 junctions 20-25: • M621 junctions 1-7 improvements: <p>Additional schemes identified in the WYIS that are relevant to Bradford will need to be included in the LIP. The relevant schemes are listed in the representation.</p> <p>The list of additional schemes to be included in the LIP may well change if any further capacity enhancement schemes are found to be necessary. This will only become clear when the final list of sites proposed for development is published in the draft Site Allocations Development Plan Document.</p>	<p>Noted confirmation of schemes that are funded and identification of further schemes.</p> <p>The Council's Local Infrastructure Plan (LIP) sets out the strategic infrastructure requirements in relation to delivering growth in the District. The LIP is based on the best information available at time. The purpose of the LIP is to demonstrate a funding gap to justify introduction of a CIL and inform the Draft Regulation 123 List.</p> <p>The LIP will be updated on a regular basis in consultation with key partners, local communities and infrastructure providers. The Council will consider these comments as part of the LIP update.</p>
------	------	------------------	---	--

0008	Hall	Natural England	<p>1. Welcome recognition in the plan of the need to green infrastructure and other measures to mitigate impacts from new development on the South Pennine Moors SPA/SAC.</p> <p>2. The prioritisation of costed alternative greenspace mitigation in the 7km zone around the South Pennine Moors Natura 2000 should be a priority. Recommend the draft Infrastructure plan section 6.4. and in section 9.2.7 which currently refers to green infrastructure is made more explicit and reference is made to the need to secure such measures in perpetuity.</p>	<p>1. Comment noted.</p> <p>2. The Local Infrastructure Plan (LIP) sets out the strategic infrastructure requirements in relation to delivering growth in the District. This has helped identify an infrastructure funding gap and inform the Preliminary Draft Regulation 123 List. The CIL DCS is primarily concerned with the rates the CIL is to be set at, rather than the specific infrastructure items it will contribute towards. The LIP will be updated on a regular basis in consultation with key partners, local communities and infrastructure providers. The Council will consider these comments as part of the LIP update.</p>
0016	Pickles	Local Resident	<p>1. The evidence provided is limited and does not take into account critical infrastructure requirements and the particular demographics of a particular area.</p> <p>2. Previous comments and concerns put forward have not been satisfactorily addressed. The statement that CIL will not be the only funding to provide infrastructure improvements is rather evasive, a sound business plan should identify how the full estimated financial commitment will be met.</p> <p>3. The base line information is dated and needs further review (For example the recent floods indicate a number of the sites will require additional investment on top of that proposed and identified in the LIP). This applies to all sites</p>	<p>1. The Local Infrastructure Plan (LIP) sets out the strategic infrastructure requirements needed to support growth in the District. This has helped identify an infrastructure funding gap and inform the Preliminary Draft Regulation 123 List. The LIP is considered robust and relevant as it is based on the Local Plan Core Strategy.</p> <p>The CIL NPPG (paragraph 17) states that the Government recognises that there will be uncertainty in pinpointing other infrastructure funding sources, particularly beyond the short-term and the evidence focus on providing evidence of an aggregate funding gap that demonstrates the need to put in place the levy.</p>

			<p>not just those close to the flood plains. Note this was an actual not hypothetical event, after the information previously presented, which warrants a main modification to address this serious issue. Additional investment is needed to protect existing residents, from worsening situations possible from inadequate prevention measures being provided on new sites.</p> <p>The figures indicated in the LIP are out of date and although acknowledged we are working with a moving target, these need to be reviewed to provide accurate CIL pricing. Further work is required with utilities, drainage providers to take into account the work that has taken place and identified to be needed since the LIP was produced.</p>	<p>2. In accordance with CIL Regulations the council has considered and responded to all comments received on the PDCS. This is set out in the Statement of Consultation supporting the CIL DCS. The council therefore disagree comments have not been addressed.</p> <p>As previously stated CIL monies will help fund infrastructure to support growth, however the CIL is not intended to be the only funding source for infrastructure and therefore the Council will not be relying solely on CIL receipts for the delivery of infrastructure. This is clearly set out in the CIL Regulations and CIL NPPG, which requires the council to identify an infrastructure funding gap to justify a CIL and then strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments.</p> <p>Strategic infrastructure issues are identified in the LIP. The approach to infrastructure funding and delivery across the District to support growth is set out in the Local Plan Core Strategy (in particular policies ID2 and ID3), which is currently being considered through an Examination in Public.</p> <p>3. The DCS has been informed by the latest</p>
--	--	--	--	--

				<p>version of the LIP. The LIP has helped identify an infrastructure funding gap and inform the Preliminary Draft Regulation 123 List.</p> <p>As set out in the CIL NPPG (paragraph 17) the Government recognises that there will be uncertainty in pinpointing other infrastructure funding sources, particularly beyond the short-term and the evidence focus on providing evidence of an aggregate funding gap that demonstrates the need to put in place the levy.</p> <p>The council disagree a main modification is required as the council consider the CIL DCS is based on robust and available evidence in the LIP. The LIP is a live document and will be updated on a regular basis in consultation with key partners, local communities and infrastructure providers. Once adopted the council will keep the CIL, Regulation 123 list and LIP under review to ensure the CIL remains appropriate over time.</p>
0018	Thompson	Local Resident	<p>1. The draft charging schedule needs to be directed towards supporting a realistic and appropriate Infrastructure Plan. It is not. The LIP 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</p>	<p>1. The CIL DCS and relevant evidence including the LIP has been worked up alongside the production of the Bradford District Local Plan Core Strategy in accordance with the National Planning Practice Guidance..</p> <p>The council consider the CIL DCS is based on robust and appropriate evidence in the LIP. The LIP is a live document and will be updated on a</p>

			<p>areas:</p> <p>Flooding: Ilkley floods regularly, primarily because of run off from the moor. The Council has not shown due diligence in examining flood risk or considered the limits of our (combined) sewerage/drainage system.</p> <p>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.</p> <p>2. 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.</p>	<p>regular basis in consultation with key partners, local communities and infrastructure providers. Once adopted the council will keep the CIL, Regulation 123 list and LIP under review to ensure the CIL remains appropriate over time.</p> <p>As set out in the CIL NPPG (paragraph 17 the Government recognises that there will be uncertainty in pinpointing other infrastructure funding sources, particularly beyond the short-term and the evidence focus on providing evidence of an aggregate funding gap that demonstrates the need to put in place the levy.</p> <p>2. The CIL DCS has been set in relation to viability evidence and not policy objectives.</p>
--	--	--	--	--

0020	Brook	Johnson Brook – on behalf of a consortium of house builders and strategic land developers	<p>There are limitations to the area specific and site specific viability evidence. Concern with the lack of clear infrastructure cost information for the three main stages of the plan period and the current lack of data to assist developers/landowners and their advisors in assessing typical combined cost impacts from CIL/Section 106 /Section 278 agreements.</p> <p>The Plan does not yet give specific financial information on which the balance of public/private investment in infrastructure can be derived or how CIL contributions will be balanced in percentage and other terms against contributions expected from section 106 and 278 contributions.</p> <p>Given the lack of evidence, particularly in the Local Infrastructure Plan, it is difficult to arrive at a clear conclusion in relation to whether the proposed CIL rates strike and appropriate balance. The stage reached on the production of the Local Plan does not assist in answering this question</p>	<p>The CIL DCS and relevant evidence including the LIP has been worked up alongside the production of the Bradford District Local Plan Core Strategy in accordance with the National Planning Practice Guidance (NPPG).</p> <p>The council consider the CIL DCS is based on robust evidence in the LIP. The LIP is a live document and will be updated on a regular basis in consultation with key partners, local communities and infrastructure providers. Once adopted the council will keep the CIL, Regulation 123 list and LIP under review to ensure the CIL remains appropriate over time.</p> <p>The CIL NPPG (paragraph 17) states that the Government recognises that there will be uncertainty in pinpointing other infrastructure funding sources, particularly beyond the short-term and the evidence focus on providing evidence of an aggregate funding gap that demonstrates the need to put in place the levy.</p> <p>The CIL DCS is primarily concerned with the rates the CIL is to be set at, rather than the specific infrastructure items it will contribute towards. The LIP will be updated on a regular basis in consultation with key partners, local communities and infrastructure providers.</p>
------	-------	---	--	--

				The CIL has been worked up alongside the Local Plan core Strategy which is currently at Examination in Public. The Core Strategy has been prepared in accordance with the NPPF and is therefore considered a relevant and up to date Local Plan
0020	Brook	Johnson Brook – on behalf of a consortium of house builders and strategic land developers	<p>This is a key part of the evidence base. As acknowledged at page 3 of the Executive Summary it is difficult at present to “establish medium and longer terms plans due to uncertainty over funding and service provision in public and private sectors.”</p> <p>At the present time the LIP best be described as exploratory and generally aspirational and lacking in programmed financial information, with the possible exception of transport. It sets out in general terms what will be needed to achieve a clear return to the public sector through CIL and other charging regimes. It does not identify in percentage terms the expected level of contribution from CIL and other funding sources, including within the planning sector section 106 and 278 agreements.</p> <p>There is much work to be done in order to arrive at a set of costed and phased infrastructure investments which have an updated relationship with the quantum of development expected to be delivered via the Core Strategy once modified and adopted. The lack of reliable financial cost information in the current version of the LIP combined with limited and atypical site viability information make it very difficult to assess the combined impact of CIL/section 106/section 278. This position</p>	<p>The CIL DCS and relevant evidence including the LIP has been worked up alongside the production of the Bradford District Local Plan Core Strategy in accordance with the National Planning Practice Guidance.</p> <p>The council consider the CIL DCS is based on robust evidence in the LIP. The LIP is a live document and will be updated on a regular basis in consultation with key partners, local communities and infrastructure providers. Once adopted the council will keep the CIL, Regulation 123 list and LIP under review to ensure the CIL remains appropriate over time.</p> <p>As set out in the CIL NPPG (paragraph 17) the Government recognises that there will be uncertainty in pinpointing other infrastructure funding sources, particularly beyond the short-term and the evidence focus on providing evidence of an aggregate funding gap that demonstrates the need to put in place the levy.</p> <p>The CIL DCS is primarily concerned with the rates</p>

			together with market uncertainties in Bradford necessitates a cautious approach to the CIL charging rates to be applied for the next few years.	the CIL is to be set at, rather than the specific infrastructure items it will contribute towards. The LIP will be updated on a regular basis in consultation with key partners, local communities and infrastructure providers.
0020	Brook	Johnson Brook – on behalf of a consortium of house builders and strategic land developers	In the principal town of Ilkley and the local service centres of Burley-in-Wharfedale and Menston more work is needed to establish realistic cost parameters of new infrastructure and upgrades to existing infrastructure. The much needed replacement new school for the existing Ilkley Grammar School is a key example. The costs of a replacement, up to 2,000 places, school are known but are not yet programmed despite the proven need for this in the short term. We estimate that a total of at least 10 to 12 residential allocations will be necessary on greenfield and brownfield sites in Wharfedale to meet the current housing needs distributed to this market sub area in the current pre-modifications draft of the CS. All of these sites will fall in the catchment area of the new school and should contribute to the private sector percentage of the total funding cost. There is a need to establish a mechanism and the levels of contribution expected and how this will relate to CIL Regulations on pooling and avoiding double –dipping.	<p>Comment noted. The CIL DCS and relevant evidence including the LIP has been worked up alongside the production of the Bradford District Local Plan Core Strategy in accordance with the National Planning Practice Guidance.</p> <p>The council have not yet published the site Allocations DPD. Therefore the council do not have the certainty or detail in regards to site specific requirements of specific sites. As set out in the CIL NPPG (paragraph 17) the Government recognises that there will be uncertainty in pinpointing other infrastructure funding sources, particularly beyond the short-term and the evidence focus on providing evidence of an aggregate funding gap that demonstrates the need to put in place the levy.</p> <p>It is not considered appropriate at this time for the Council to be any more specific. However the LIP and CIL Charging Schedule will be reviewed and updated following adoption of CIL based on the most up to evidence and more detailed site allocation information.</p>

				The council consider the CIL DCS is based on robust evidence in the LIP.
CIL Economic Viability evidence				
0010	Batterley	Wilsden Parish council	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.	<p>Comment noted. The proposed charging zones are based on postcode sectors and average house price data, over a defined period. The council recognise that within the same charging zone there may be areas where sales values may be higher or lower than the average values assessed in the Viability Report.</p> <p>However, it is considered the broad district wide viability assessment provides robust and appropriate evidence to inform the charging zones. New build sales value assumptions for each value area have been used to inform sales value assumptions in the area wide development scheme viability testing and the proposed CIL rates</p>
0012	Smith	Local Councillor	<p>1. DTZ document is impressive yet there is no consideration of the residents having this cost past onto them in the purchase price.</p> <p>2. Their suggestion of 36% of the new homes would be in the greenbelt goes contrary to Government policy</p>	<p>1. Noted. It is the intention that the CIL charge will be factored into the land value and should not therefore impact house prices.</p> <p>2. The CIL viability assessment does not propose any percentage of new homes in the Greenbelt. The report makes reference to evidence in regards to the potential housing supply as indicated in the SHLAA and split between greenfield and brownfield. This comment is therefore not considered relevant to the CIL DCS.</p>

0016	Pickles	Local Resident	Dramatic differences between neighbouring areas, using house price data and post code allocation is too restrictive without fullness or scope. Using only a small number of developments as a reference data set, which do not fully take into account the local features of each particular area is unsound and increases the possibility of data errors.	<p>The proposed charging zones are based on postcode sectors and average house price data, over a defined period. The council recognise that within the same charging zone there may be areas where sales values may be higher or lower than the average values assessed in the Viability Report. However, it is considered the broad district wide viability assessment provides robust and appropriate evidence to inform the charging zones. In accordance with the CIL National Planning Practice Guidance the council has sought avoid undue complexity in setting differential residential rates.</p> <p>The Viability Assessment uses a district wide viability model and sample of sites relevant to the Local Plan. The council consider the viability assessment provides robust and appropriate evidence in accordance with the CIL Regulations and National Planning Practice Guidance</p>
0018	Thompson	Local Resident	The DTZ June 2015 Viability Report 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 market housing	<p>The council is unsure as to specifically which part of the evidence the comment is referring to. The CIL Viability Evidence (2015) provides an overview of the residential market in the District. However, it does not provide evidence for household formation rates. This is outside the remit of CIL.</p> <p>The council consider the CIL Viability report provides robust evidence to inform the proposed</p>

				CIL rates in the DCS.
0018	Thompson	Local Resident	<p>1. 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 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</p> <p>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</p> <p>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 house building. DTZ makes the following statement:</p> <p>‘The average house price in Bradford currently stands at circa £149,000’ (referring to Q3 2014) p. 60 CIL Viability Evidence; DTZ; June 2015</p> <p>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</p>	<p>1. CIL National Planning Practice Guidance (NPPG) states the council should use an area based approach involving a broad test of viability across the area as evidence to inform the charge. It is considered the District wide viability assessment provides robust and appropriate evidence to inform the CIL charging rates.</p> <p>New build sales values form the base viability testing for CIL testing purposes. The viability addendum takes account of changing market conditions since the earlier evidence base was collated and presents revised appraisals based on the most up to date new build sales evidence and build cost information. Details of the residential market evidence on sales values are set out at Appendix A of the DTZ Viability.</p> <p>2. The CIL Viability Assessment uses a range of site value thresholds intended to be representative of typical net land prices in different parts of the District. Although evidence of transaction data is limited the DTZ viability assessment reviewed VOA Property Market reports and have consulted land agents, land owners and developers in arriving at the benchmarks used below. In accordance with RICS guidance, it has discounted the site value benchmarks to allow for the impact of CIL.</p>

			<p>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. The evidence presented in Appendix 1 of the representation shows clearly that DTZ has substantially overestimated property prices and overlooked negative equity in the local market.</p> <p>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.</p> <p>2. 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.</p>	<p>It is considered the district wide viability assessment provides robust and appropriate evidence to inform the CIL charging rates.</p>
--	--	--	---	---

			<p>The Council should 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.</p>	
0019	Thomas	<p>The Planning Bureau Ltd on behalf of McCarthy & Stone Retirement Lifestyles Ltd</p>	<p>Where the provision of specialist accommodation for the elderly plays a clear role in meeting housing needs in the emerging or extant Development Plan, as it does in the context of the Bradford LDF, by not properly considering the effect of CIL on this form of development the Council would be putting the objective of the Development Plan at risk and thereby contravening Government Guidance.</p> <p>The demographic profile of the Authority is projected to age. The proportion of the population aged 60 and over is projected to increase from 18.1% to 20.2% between 2008 and 2026. The largest proportional increases in the older population are expected to be of the 'frail' elderly, those aged 75 and over, who are more likely to require specialist care and accommodation provided by Extra Care accommodation.</p> <p>In light of the above, we consider that it is of vital importance that the emerging CIL does not prohibit the development of specialist accommodation for the elderly at a time when there is an existing and urgent need for this form of development and that by not properly assessing</p>	<p>The council recognise that NPPF requires objectively assessed housing needs to be met and that the emerging Core Strategy seeks to meet housing needs of all sectors (including those with specialist requirements).</p> <p>The impact of CIL on a care home was modelled in the Viability Assessment (June 2015). The conclusion was that this type of development was not viable to bear CIL. Therefore the Draft Charging Schedule excludes care homes and other forms of specialist accommodation in the C2 Use Classes Order from CIL charge.</p> <p>In regards to the Viability evidence the council recognise that certain schemes will adopt different inputs to those used within the CIL Viability Assessment however the council consider that the assumptions used within the CIL viability assessment for residential development generally align with normal figures expected in the majority of developments.</p>

			<p>this form of development the proposed CIL rate would threaten the delivery of the relevant Local Development Plan.</p> <p>The Retirement Housing Group (RHG), a consortium of retirement housing developers and managers from the private sector and housing associations, commissioned the consultants Three Dragons to produce a paper that provides evidence and guidance for viability practitioners in appraising sheltered / retirement and extra care accommodation.</p> <p>We therefore consider that there is now a considerable amount of guidance available for charging authorities and viability practitioners with which to assess the viability of specialist accommodation for the elderly both competently and quickly.</p> <p><u>Communal Areas</u></p> <p>Many forms of specialist accommodation for the elderly, such as retirement housing, provide communal areas for residents at an additional cost to developers. Specialist housing providers also have additional financial requirements as opposed to other forms of development that will only pay on 100% saleable floorspace. This does not provide a level playing field for these types of specialist accommodation and a disproportionate charge in relation to saleable area and infrastructure need would be levied.</p> <p>This places providers of specialist accommodation for the</p>	<p>The CIL Regulations only allow differentiation by geographical area, intended use and size of development. Distinctions can only be made between intended uses of development if the uses are genuinely different in terms of their physical characteristics and purposes of the use of the land. Differential rates must be set in such a way that they do not grant any selective advantage and should only be based on economic viability evidence.</p> <p>In addition the CIL rates for residential uses proposed have been set below the maximum rates set out in the CIL Viability Assessment and therefore include a significant viability buffer. The CIL Viability Assessment also takes a cautious approach in a number of assumptions, thereby increasing the overall viability buffer which should account for any differences in business models for residential developments.</p> <p>The Council therefore does not consider that there are outstanding reasons to support a differentiation between general residential development and elderly/retirement accommodation in the District.</p> <p>It is considered the District wide CIL Viability Assessment provides robust and appropriate</p>
--	--	--	---	--

			<p>elderly at a disadvantage in land acquisition as the ratio of CIL rate to net saleable area would be disproportionately high when compared to other forms of residential accommodation</p> <p>Sales Rates In the case of retirement housing for example there is also a much longer sales period which reflects the niche market and sales pattern of a typical retirement housing development. This has a significant knock on effect upon the final return on investment.</p> <p><u>Empty Property Costs</u> Properties can only be sold upon completion of the development and the establishment of all the communal facilities and on-site house manager. These communal areas cost additional monies to construct and are effectively subsidised by the developer until a development has been completely sold out. In a McCarthy and Stone development the staff costs and extensive communal facilities are paid for by residents via a management / service charge. However, due to the nature of these developments the communal facilities have to be fully built and operational from the arrival of the first occupant.</p> <p><u>Build Costs</u> Whist the Viability Assessment differentiates between the build costs between bungalows, houses and apartments, excluding abnormals, it does not consider the build costs of flatted sheltered housing.</p>	<p>evidence to inform the CIL charging rates.</p>
--	--	--	---	---

			<p>The Build Costs Information Services (BCIS) shows that the Mean Average Build Costs per m² for a region. This database consistently shows that build costs vary significantly between housing types with the cost of providing sheltered housing consistently higher than for general needs housing and apartments. While the BCIS figures are subject to fluctuation it is our experience that specialist accommodation for the elderly tends to remain in the region of 5% more expensive to construct than apartments and generally between 15 to 20 % more expensive than estate housing.</p> <p><u>Summary</u> We would therefore respectfully request that the Council tests the viability of specialist older person's accommodation.</p> <p>ADDITIONAL EVIDENCE attached to representation</p> <ul style="list-style-type: none"> • <i>Retirement Housing Group –CIL Briefing Note</i> <p><i>McCarthy and Stone Retirement Lifestyles & Churchill Retirement Living- Joint CIL Position Paper</i></p>	
--	--	--	--	--

0019	Thomas	The Planning Bureau Ltd on behalf of McCarthy & Stone Retirement Lifestyles Ltd	<p>Addendum to Representation 0019</p> <p>Whilst we consider that the information sent in our original representation is useful, it is generic in scope. It has come to our attention that there is viability information specific to Bradford, particularly likely that it is relevant to determining the viability of specialist older persons housing in the Authority.</p> <p>McCarthy and Stone has been historically active in Bradford and in the previous two years have submitted two planning applications for specialist older persons accommodation in Ilkley 2015/2016. These are as follows:</p> <ul style="list-style-type: none"> - Application for 24 retirement Apartment at the Craigland’s Hotel, Cowpasture Road Ilkley (App Ref 15/01793/MAF) - Application for 44 Retirement Apartments at Mayfield Road, Ilkley (App Ref15/07583/MAF) <p>Financial viability assessments determining the extent of planning obligations accompanied each of the planning applications. In both instances the development proposed was not able to provide policy compliant levels of affordable housing.</p> <p>We have provided DAT models. (two data files provided as part of the representation)</p> <p>In the instance of Cowpasture Road Development the proposed CIL liability of £263,600 would significantly exceed the agreed sum available for planning obligations</p>	<p>The council note the submitted viability assessments. In regards to the Viability evidence the council recognise that certain schemes will adopt different inputs to those used within the CIL Viability Assessment however the council consider that the assumptions used within the CIL viability assessment for residential development generally align with normal figures expected in the majority of residential developments.</p> <p>In addition the CIL rates for residential uses proposed have been set below the maximum rates set out in the CIL Viability Assessment and therefore include a significant viability buffer. The CIL Viability Assessment also takes a cautious approach in a number of assumptions, thereby increasing the overall viability buffer which should account for any differences in business models for residential developments.</p> <p>It is considered the District wide CIL Viability Assessment provides robust and appropriate evidence to inform the CIL charging rates. The impact of CIL on a care home was modelled in the Viability Assessment (June 2015). The conclusion was that this type of development was not viable to bear CIL.</p> <p>Therefore the Draft Charging Schedule excludes care homes and other forms of specialist</p>
------	--------	---	--	---

			<p>which is £72,375. This development would therefore be rendered undeliverable by CIL.</p> <p>At the Mayfield Road application, the proposed CIL liability would be £ 284,000 and would leave available a sum of £ 32,252 to meet affordable housing contributions. The imposition of CIL as proposed would therefore be a barrier to the delivery of policy compliant affordable housing contributions on the site.</p>	<p>accommodation in the C2 Use Classes Order from CIL charge. The Council therefore does not consider that there are outstanding reasons to support a differentiation between general residential development and elderly/retirement accommodation in the District.</p>
0020	Brook	Johnson Brook – on behalf of a consortium of house builders and strategic land developers	<p>There are limitations to the area specific and site specific viability evidence. Sample site specific negotiated section 106 and 278 agreements result in much higher figures per dwelling than the general assumption used in the evidence base of £1,000/dwelling.</p>	<p>The Council considers that it has used the appropriate available evidence in regards to viability. The inputs into the CIL Viability assessment, including S106 allowance, were consulted on with a range of developers, agents and house builders. The council therefore considers the Viability Assessments is based on robust and up-to date evidence.</p> <p>The S106 allowance includes contributions which would typically remain as a site specific S106 obligation alongside a CIL tariff but does not include pooled contributions currently collected through S106, which will be collected through CIL.</p>

0020	Brook	Johnson Brook – on behalf of a consortium of house builders and strategic land developers	<p>Agree with Cushman and Wakefield that the Bradford market and sub markets are particularly difficult to assess due to the following factors (amongst others):-</p> <ul style="list-style-type: none"> • Lack of transactions • Wide variations in transaction details/outcomes • Differences in socio-economic geography within and between market sub areas and the selected post code areas. • Weak market delivery persisting in all sub areas. <p>In the lower value areas this is a result of viability, infrastructure requirements and general lack of market attractiveness. In the higher value areas the relative lack of brownfield sites and community resistance to greenfield site delivery are major factors.</p> <p>Therefore, consider that the small number of site specific project appraisals for assessing the viability of the CIL residential charging rate largely represent a series of atypical sites which do not give a good representation and fit with typical greenfield development scenarios. We accept that brownfield scenarios are more likely to be atypical.</p>	<p>CIL National Planning Practice Guidance (NPPG) states the council should use an area based approach involving a broad test of viability across the area as evidence to inform the charge. The Viability Assessment uses a district wide viability model and sample of sites relevant to the Local Plan. The council consider the viability assessment provides robust and appropriate evidence in accordance with the CIL Regulations and NPPG</p> <p>It is considered the district wide viability assessment provides robust and appropriate evidence to inform the CIL charging rates.</p>
0020	Brook	Johnson Brook – on behalf of a consortium of house builders and strategic land developers	<p>The CIL Residential Charging Rates are advised by the evidence base; that being the December 2015 Update. The EVA (Table 2.5, page 7) includes a series of cost assumptions with one of the largest development cost factors being Affordable Housing Transfer Values. The EVA creates a sub-area approach which has regard to the difference in market values. Each sub-area is attributed a transfer value based upon a discount of OMV.</p>	<p>The council consider the District wide CIL viability assessment provides robust and appropriate evidence to inform the CIL charging rates. The inputs into the CIL Viability assessment, including transfer values, were consulted on with a range of stakeholders including the council’s affordable housing team.</p> <p>The council’s affordable housing policy is outside</p>

			<p>The system works in that it permits a relatively transparent approach that can be understood. For example, a development in Wharfedale delivers a 2-bed house to an RSL, the RSL pays the developer say £90,00 which would be 50% of its £180,000 OMV. The 2 bed unit is circa 700 sq ft in size.</p> <p>Unfortunately, the Affordable Housing Team are not now operating that system such that RSLs are effectively being left to make their own offers which in recent months is resulting in transfer values significantly below those used in the EVA to support the CIL. Recent reports suggest offers being a reduction twice the size identified in the EVA.</p> <p>This creates a problem for the forthcoming CIL examination in that the EVA and CIL Charging proposal is now flawed in its assumptions. You can correct this current anomaly by one or the two following means:-</p> <ul style="list-style-type: none"> · Option 1: Re-work the EVA to lower the transfer value assumptions which may then in fact justify a lower CIL rate, or · Option 2: Align affordable housing policy on transfer values to match the CIL EVA. In other words, ask the Affordable Housing Team to use those values in Table 2.5 as the mechanism to insert into the S106 Agreements. 	<p>the remit of the CIL charging schedule itself.</p> <p>While there has been no formal change to the council's approach to affordable housing transfer values since the CIL viability evidence was undertaken, it is recognised that Registered Providers ability to take on affordable housing properties secured through S106 is currently challenging. This has resulted in greater flexibility in the approach to negotiating transfer values in order to secure delivery of affordable housing on certain residential schemes.</p> <p>The proposed CIL rates for residential uses have been set below the maximum rates set out in the Viability Assessment and therefore include a significant viability buffer. The Viability Assessment also takes a cautious approach in a number of assumptions, thereby increasing the overall viability buffer which should account for any differences in the approach to transfer values for affordable housing developments.</p> <p>It is therefore considered the District wide CIL Viability Assessment provides robust and appropriate evidence to inform the proposed CIL charging rates. And the council considered that it has been struck an appropriate balance between the need to fund infrastructure and impact on viability.</p>
--	--	--	---	--

Infrastructure Issues				
0002	Rios	Highways England	<p>Capacity improvement schemes on the strategic road network (SRN) are necessary to address the impact of increasing traffic levels caused by growth generated by or attracted to developments proposed in the Local Plans of planning authorities in West Yorkshire and neighbouring areas.</p> <p>The overall scale of development indicated in the Core Strategy will have a significant adverse traffic impact on the operation of the SRN in West Yorkshire and its junctions with the local primary road network.</p>	<p>Noted. The relevant plan for CIL is the Local Plan for Bradford District. The Core Strategy is currently being considered through an Examination in Public. The CIL DCS has been worked up alongside the production of the Bradford District Local Plan Core Strategy in accordance with the National Planning Practice Guidance.</p> <p>The Council's Local Infrastructure Plan (LIP) sets out the strategic infrastructure requirements in relation to delivering growth in the District identified in the Core Strategy. This has helped identify an infrastructure funding gap and inform the Draft Regulation 123 List.</p> <p>The Council have used the evidence in the LIP and to strike an appropriate balance between the desirability of funding infrastructure from the levy and the potential impact on the viability of development.</p>
0002	Rios	Highways England	<p>Where sites have a severe impact on the SRN measures will be required to reduce and mitigate that impact. Sites which have severe individual impacts will need to demonstrate that any committed RIS schemes are sufficient to deal with the additional demand generated by that site.</p> <p>Where committed schemes will not provide sufficient capacity or where Highways England does not have</p>	<p>Planning obligations will remain alongside CIL to ensure impacts of individual applications can be made acceptable in planning terms. From April 2015 s106 agreements can only relate to matters to make a development acceptable in planning terms.</p> <p>CIL monies can be used to deliver strategic</p>

			committed investment, sites may need to deliver or contribute to additional schemes identified by the Highways England WYIS and included in the LIP	Infrastructure requirements across the district. CIL monies should not be used to remedy pre-existing deficiencies in infrastructure provision, unless those deficiencies will be made more severe by new development.
0004	Grint	Local residents	We believe all the factors listed in our previous representation 19 th August 2015 should still be considered but need to be in the context of the changes in relation to changing weather patterns. The recent flooding situations have increased the responsibility that now sits with the council to ensure development of further housing is only allowed in safe situations. For safe situations you are faced with considering the immediate impact, the 5/10 year impact and the long term impact, especially a warmer world and more probability of flooding.	<p>CIL has been introduced by Government to contribute to the provision of infrastructure and support growth. CIL will help pay for infrastructure required across the district to support growth. Strategic infrastructure issues are identified in the LIP including a flood risk and drainage infrastructure assessment.</p> <p>Planning obligations will remain alongside CIL to ensure impacts of individual applications can be made acceptable in planning terms, including flood risk.</p> <p>The CIL is not a plan providing policies or proposals for the location for growth / development in the District. This will be considered through the Local Plan Core Strategy and Allocations Development Plan Document.</p>
Regulation 123 List				
0005	Smith	Historic England	Welcome the identification of green infrastructure and public realm improvements as potential projects within the indicative Regulation 123 List	Comment noted.
0008	Hall	Natural England	1. welcome the inclusion of the following measures: - Green infrastructure and public greenspace (e.g. improvements to open space), except for on-site provision	1. Support noted. 2. The Regulation 123 list sets out a list of those

			<p>required by Core Strategy policies - Habitat mitigation including Suitable Alternative Natural Greenspace, except for on-site provision required by Core Strategy policies</p> <p>2. In response to the PDCS we advised that there was a need to ensure that the avoidance/mitigation measures identified within Core Strategy policy SC8 (Protecting the South Pennine Moors and their Zone of Influence) are sufficiently funded either through the Community Infrastructure Levy (CIL), Section 106 Agreement or other mechanism. CIL offers a mechanism for funding new greenspace required to avoid adverse effects on Natura 2000 sites.</p> <p>Recommend that the draft Reg 123 list is made more explicit and reference is made to the need to secure such measures in perpetuity. It is important to provide sufficient certainty in CIL charging schedules that necessary mitigation measures will be secured through CIL. Recommend that these are made more explicit in their importance for delivery of mitigation measures related to the South Pennine Moors Natural 2000 site.</p>	<p>projects or types of infrastructure that it intends will be, or may be, wholly or partly funded through the CIL. Habitat mitigation is included on the 123 List. The 123 List, may be revised and updated following adoption of CIL, however it is not considered appropriate at this time for the Council to be any more specific.</p> <p>It is recognised that the council are responsible for securing adequate mitigation for European site impacts and will put in place a system which ensures that mitigation is delivered and effective in accordance with the NPPG. This is outside the remit of the CIL charging schedule and will be set out through the Local Plan/SPD following adoption of the CIL.</p>
0011	Ledger	Sport England	<p>Welcome the inclusion of community sport facilities on the list and in particular the specific exemption on improvements which are directly related to a development.</p> <p>Suggest that this wording is broadened to include the resolution of site specific replacement sports facilities and</p>	<p>Comment noted. The Regulation 123 list sets out a list of those projects or types of infrastructure that it intends will be, or may be, wholly or partly funded through the CIL</p> <p>Sports improvements which are directly related</p>

			<p>playing fields at the time of a planning application, eg as set out in para 74 of the NPPF. It is more sensible to resolve this loss at the time of a planning application via S106 or other legal mechanism than seek mitigation through CIL which may not replace the facilities lost like for like or better.</p>	<p>to a development are specifically excluded on the 123 List. The proposed change could provide additional clarity to the 123 List by including replacement sports facilities and playing pitches under the continued use of S106, however it is not considered appropriate at this time for the Council to be any more specific.</p>
0013	Coy	Canal and River Trust	<p>Green Infrastructure (GI) and pedestrian/cycle networks are included within the Draft Regulation 123 List. The inland waterway network, including the canals and towpaths, is a form of GI that provides pedestrian and cycle routes across the Plan area.</p> <p>Any infrastructure included on an adopted Regulation 123 list cannot be funded through s106 agreements. To date, s106 agreements have been important as a tool for seeking the mitigation of impacts of development on our waterway network. GI covers a wide range of types of infrastructure and as such it is likely that only certain GI projects will actually benefit from CIL funding.</p> <p>Having regard to this context, we are concerned that our waterway infrastructure, the Leeds & Liverpool Canal, is subsumed within a very broad type of infrastructure, i.e. GI, on the Draft Regulation 123 List.</p> <p>We consider that there is a need to more precisely define GI projects on the Regulation 123 List so as to prevent a situation occurring in which specific types of GI fail to</p>	<p>Comment noted. The Regulation 123 list sets out a list of those projects or types of infrastructure that it intends will be, or may be, wholly or partly funded through the CIL. This is outside the remit of the Charging Schedule itself.</p> <p>Improvements to strategic pedestrian and cycle routes are included on the Draft 123 List, however it is not considered appropriate at this time for the Council to be any more specific. Improvements required as a direct result of development are excluded from the 123 List. The 123 List, may be revised and updated following adoption of CIL.</p>

			<p>actually benefit from CIL and at the same time cannot be funded through s106 agreements. As such, we would welcome the opportunity to discuss specific projects for inclusion on the Draft 123 list. For example, we have identified that the towpath between the Council boundary with Craven through Silsden to Lower Holden Farm is in need of investment to improve the towpath surface and access to it.</p> <p>Furthermore, the towpath between Bingley and Saltaire experiences great usage as it connects the Bingley Five and Three Rise Locks with Salts Mill and Saltaire, a World Heritage Site.</p> <p>Tourists and visitors flock to these heritage attractions and use the towpath to fully experience them. As such the towpath provides a sustainable transport option for visiting these attractions and helps reduce car usage in the area.</p> <p>Therefore, we also recommend that this section of the towpath should be included as a project on the Draft 123 list as improvements to this section would benefit Green and pedestrian/cycle infrastructure. This would help promote the use of the towpath and improve sustainable transport options within the area as well as providing more opportunities for leisure and recreation for local residents.</p>	
0016	Pickles	Local resident	<p>The draft Reg123 list is lacking in detail, I realise it could be modified at a later stage,</p> <p>1.Cycle routes are included in both CIL and s106/s278?</p>	<p>1. The regulation 123 list sets out a list of those projects or types of infrastructure that it intends will be, or may be, wholly or partly funded through the CIL. This is outside the remit of the</p>

			<p>3. Not clear how special highway works/(relief road)improvement will be delivered?</p> <p>4. Education has moved to CIL (issue with pooling of 5 obligations?). The priority for Silsden is a relief road (identified in various documents) and improved drainage, how will this be funded and by what financial delivery mechanism and within what time scale?</p> <p>5. Document presented does not take into account proposed local Parish Council/Neighbourhood Plan 123 list (namely given that CBMDC are looking to local communities to manage local resources e.g. libraries on a voluntary basis with local funding support this needs to be taken into account)</p> <p>6. Agree s106 remains for affordable housing</p>	<p>Charging Schedule itself. It is not considered appropriate at this time for the Council to be any more specific.</p> <p>Sustainable transport improvement schemes including strategic cycle routes are included on the R123 list except where improvements are required as a direct result of development. Therefore local cycle / pedestrian routes and connections can still be continue to be secured through S106 if directly related to the development</p> <p>3. The regulation 123 list sets out a list of those projects or types of infrastructure that it intends will be, or may be, wholly or partly funded through the CIL. The 123 list does not set out detailed delivery of infrastructure to be provided. Mechanisms such as S106/S288 will still be used to deliver site specific improvements required to make a development acceptable in planning terms.</p> <p>4. As education is identified in the Draft R123 it is not currently proposed to continue to secure pooled education contributions through 106. The regulation 123 list sets out a list of those projects or types of infrastructure that it intends will be, or may be, wholly or partly funded through the CIL. The 123 list does not set out detailed delivery</p>
--	--	--	--	--

				<p>of infrastructure to be provided. Mechanisms such as S106/S288 will still be used to deliver site specific improvements required to make a development acceptable in planning terms</p> <p>5. As set out in the CIL NPPG the council must spend the levy on infrastructure needed to support the development of their area, and decide what infrastructure is needed. The use of neighbourhood funds should match priorities expressed by local communities, including priorities set out formally in neighbourhood plans. The Government does not prescribe a specific process for agreeing how the neighbourhood portion should be spent.</p> <p>The regulation 123 list sets out a list of those projects or types of infrastructure that it intends will be, or may be, wholly or partly funded through the CIL. It is therefore not considered appropriate at this time for the Council to be any more specific in the 123 list. However the 123 List, may be revised and updated following adoption of CIL based on the most up to evidence.</p> <p>6. Comment noted</p>
--	--	--	--	---

0020	Brook	Johnson Brook – on behalf of a consortium of house builders and strategic land developers	<p>The draft 123 list is lacking in clarity and would be likely to lead to confusion and delay in the negotiation of related obligations. The draft does not deal with the situation where a site for a primary school could be provided as an integral part of a larger development. Is this to be dealt with as a contribution in kind under the Regulations? It will be difficult, as drafted, to distinguish which aspects of sustainable transport improvement schemes are directly related to the development. It will be very difficult to separate the site related and community-wide components.</p> <p>Further thought needs to be given to the relationship between on and off-site greenspace provision we are involved in the master-planning of sites where large areas of strategic greenspace will be contributed from within the site controlled by the developer . These areas will form part of a greenspace network which serves the whole community. In most cases these areas will form a contribution in kind to in the determination of the total CIL charge to be levied.</p> <p>The same points of clarification are required for on and off site habitat mitigation as all provision will result from requirements in CS policies.</p> <p>It is difficult to see how the provision of cultural facilities will be directly related to a single development. We can envisage situations where this might arise on a very large development say in excess of 1,000 dwellings.</p> <p>A clear reference needs to be made to the relationship with section 278 highway agreements.</p>	<p>The regulation 123 list sets out a list of those projects or types of infrastructure that it intends will be, or may be, wholly or partly funded through the CIL. The 123 list does not set out detailed delivery of infrastructure to be provided.</p> <p>The council have not yet published the site Allocations DPD. Therefore the council do not have the certainty or detail in regards to site specific requirements of specific sites such as urban extensions. As education is identified in the Draft R123 it is not currently proposed to continue to secure pooled education contributions through 106.</p> <p>It is not considered appropriate at this time for the Council to be any more specific in the 123 list. However the 123 List and CIL Charging Schedule may be reviewed and updated following adoption of CIL based on the most up to evidence and more detailed site allocation information.</p>
------	-------	---	--	--

0024	Mark Rushworth	North Yorkshire County Council	<p>While there does not appear to be any references to contributions to education within the Community Infrastructure Levy - Draft Charging Schedule, we note the inclusion of Education including primary and secondary provision in the draft Regulation 123 List. Our experience of CIL in other planning areas has been that it can be very difficult to secure education contributions through this mechanism.</p> <p>We therefore request that education infrastructure is removed from the draft Regulation 123 List, and that education contributions are included in the matters which will continue to be secured through Section 106 Obligations.</p> <p>Notwithstanding our preference for the use of S106 agreements, should education provision be included on the Regulation 123 List, we would request the inclusion of a reference to the use of CIL funding to contribute to education provision within North Yorkshire, where appropriate, and that NYCC should be a consultee on the prioritisation of the use of CIL funds in relation to items on the Regulation 123 List.</p>	<p>The regulation 123 list sets out a list of those projects or types of infrastructure that it intends will be, or may be, wholly or partly funded through the CIL. As education is identified in the Draft R123 it is not currently proposed to continue to secure pooled education contributions through 106.</p> <p>The 123 List may be reviewed and updated following adoption of CIL based on the most up to evidence and more detailed site allocation information. The council will consider these comments and consult with North Yorkshire County Council as part of any revision to the 123 List.</p>
CIL implementation				
0015	Corcoran	Silsden Town Council	<p>Various questions raised in relation to CIL implementation</p> <p>1. It is not clear what happens if a CIL is paid and the planning permission is not developed in total. Is the CIL refundable or will the charge be scaled back to what was actually developed?</p>	<p>1. CIL is payable on commencement of development. If the development doesn't commence there will be no payments due. If the development commences and plans are amended the CIL charges may be reassessed.</p> <p>2. Payment of CIL will be mandatory on</p>

			<p>2. The draft says if adopted the CIL charge is mandatory, if this is the case does this mean that once planning permission is granted and development commences a developer cannot renegotiate his CIL commitments?</p> <p>3. No detail has been given of how the communities share will be transferred to the STC's control.</p> <p>4. The rate bands proposed for Silsden do not appear to be capable of delivering more than 25% of the gap between capital needed for infrastructure projects to support the level of development identified in the core strategy. It is not clear how the infrastructure is to be delivered or whether the total CIL generated in the community will be retained in the community or the mechanism for STC to be party to the decision process which decides on the projects to be funded or the order in which they are undertaken.</p>	<p>chargeable development (subject to the exceptions policy outlined in the CIL regulations). Once adopted, payment of CIL is non-negotiable upon commencement.</p> <p>3. The CIL Regulations (as amended) set out the legal framework for the duty to pass CIL to local councils and calculating, collecting and spending the levy and planning obligations. Detailed information on CIL implementation, spending, collecting, reporting and is not part of the charging schedule and may be published at a different time. Further detailed guidance will be produced in the run up to CIL implementation.</p> <p>4. The monies from CIL will help pay for infrastructure required across the district to support growth. However, the CIL is not intended to be the only funding source for infrastructure and therefore the Council will not be relying solely on CIL receipts for the delivery of infrastructure</p> <p>The council must spend the levy on infrastructure needed to support the development of their area, and decide what infrastructure is needed. The Regulation 123 list sets out what CIL monies may fund.</p>
--	--	--	--	--

0021	Markham	Addingham Parish Council	<p>Various questions and issues raised in relation to collecting and implementation of CIL including:</p> <ul style="list-style-type: none"> • No detail given as to how the neighbourhood proportion will be transferred to the Parish Council's control • Unclear how infrastructure will be delivered or whether total CIL generated in in the community will be retained in the community, or how the Parish council will be party to the decision proves on projects to be funded. • There is no mechanism to describe how "payments in kind" are shared with the community. • Unclear what happens if a CIL is paid and the planning permission is not developed in total. • If CIL is mandatory does it mean that once planning permission is granted and development commences a developer cannot renegotiate CIL commitments <p>Without the above being answered it is not possible to decide if the charging bands are correct for this community or whether the geographic areas allocated to different bands are correct</p>	The CIL Regulations (as amended) set out the legal framework for the duty to pass CIL to local councils and calculating, collecting and spending the levy and planning obligations. Detailed information on CIL implementation, spending, collecting, reporting and is not part of the charging schedule and may be published at a different time. Further detailed guidance will produced in the run up to CIL implementation
Payment in Kind				
0015	Corcoran	Silsden Town Council	<p>There is no mechanism to describe how "payments in kind" are shared with the community. How will the community receive its "proportionate share" of a "payment in kind" especially if it is not in the communities boundary?</p>	The Council may decide to introduce a policy for payments in kind under CIL Regulations. This is not part of the CIL charging schedule. Any land payment must satisfy the criteria in the CIL Regulations. This is not part of the charging schedule and may be published at a different time

Exceptions Policy				
0005	Smith	Historic England	<p>While the decision to offer exceptional relief is not part of the Charging Schedule, , we would welcome the acknowledgement within the document that such relief may be offered in exceptional circumstances. In terms of our area of interest, we consider that CIL relief should be offered where the requirement to pay CIL would have a harmful impact upon the economic viability of developments which involve heritage assets particularly those which are at risk.</p>	<p>The council has published a draft exceptional circumstances policy as part of the DCS consultation. This is not part of the charging schedule and any approved policy will be published on the council's website following adoption of CIL. It is the intention that the policy will only apply should exceptional circumstances in accordance with the CIL Regulations. This may include developments which involved heritage assets.</p> <p>The council will consider comments raised and any approved policy will be published on the council's website following adoption of CIL.</p>
0016	Pickles	Local Resident	<p>1. External influences can from time to time affect viability during build, it should not be used to ease development on difficult greenfield sites where issues have been identified at design stage</p> <p>2. Question the use of Independent Appraiser of Viability being appointed by the claimant, how can they be classed as <i>independent</i>, when the hirer is the claimant.</p>	<p>1. It is the intention that the policy will only apply should exceptional circumstances in accordance with the CIL Regulations.</p> <p>2. In accordance with the NPPG the council will ensure that any exceptional circumstances relief is based on an objective assessment of economic viability. Each case is will be considered individually by the council and it is the council's discretion whether it will apply the policy. The Council will therefore expect practitioners to be reasonable, transparent and fair in objectively undertaking or reviewing financial viability assessments. The council will consider comments raised and any approved policy will be published</p>

				on the council's website following adoption of CIL.
Instalments Policy				
0015	Corcoran	Silsden Town Council	Mention is made of an installment policy, however, it appears that larger projects are given longer to pay whilst smaller projects have to pay more sooner, this appears perverse.	<p>The Council have published a draft instalments policy alongside the CIL DCS. This is not part of the CIL charging schedule and may be considered separately to the CIL. The instalments policy is based on the recommendations of the CIL Viability assessment.</p> <p>The instalments policy will increase the flexibility of payments for developers and support the viability and delivery of development of larger schemes by improving the cash flow of a development.</p>
0016	Pickles	Local resident	<p>The proposed Draft Instalments Policy favours the larger sites in preference to the smaller sites (usually local builders)</p> <p>Suggest change to ensure funding comes forward front loaded to help provision of infrastructure improvements before or parallel with development.</p> <p>Apply 10% at 3 months and 15% at 24 months all categories.</p>	<p>The Council have published a draft instalments policy alongside the CIL DCS. This is not part of the CIL charging schedule and may be considered separately to the CIL. The instalments policy is based on the recommendations of the CIL Viability assessment.</p> <p>The instalments policy will increase the flexibility of payments for developers and support the viability and delivery of development of larger schemes by improving the cash flow of a development. The council will consider comments raised and any approved policy will be published on the council's website following adoption of CIL.</p>

0020	Brook	Johnson Brook – on behalf of a consortium of house builders and strategic land developers	We support the content and approach contained in this policy.	Comment of support noted.
0021	Markham	Addingham Parish Council	It appears that larger projects are given longer to pay whilst smaller projects have to pay more sooner - this appears perverse.	<p>The Council have published a draft instalments policy alongside the CIL DCS. This is not part of the CIL charging schedule and may be considered separately to the CIL. The instalments policy is based on the recommendations of the CIL Viability assessment.</p> <p>The instalments policy will increase the flexibility of payments for developers and support the viability and delivery of development of larger schemes by improving the cash flow of a development. The council will consider comments raised and any approved policy will be published on the council's website following adoption of CIL.</p>
0022	Cartwright	Bradford Chamber of Commerce	<p>This should be fine-tuned, recognising that cash flow on projects is key. The current policy should also be amended to assist cash flow for projects over £100k, as follows:</p> <p>Instalment 1: 10% @ 6 months Instalment 2: 15% @ 12 months Instalment 3: 25% @ 18 months Instalment 4: 25% @ 24 months Instalment 5: 25% @ 30 months</p>	<p>The Council have published a draft instalments policy alongside the CIL DCS. This is not part of the CIL charging schedule and may be considered separately to the CIL. The instalments policy is based on the recommendations of the CIL Viability assessment.</p> <p>The instalments policy will increase the flexibility of payments for developers and support the viability and delivery of development of larger</p>

				schemes by improving the cash flow of a development. The council will consider comments raised and any approved policy will be published on the council's website following adoption of CIL.
CIL process				
0012	Smith	Local Councillor	<p>1. The proposed CIL DCS is based on the Core strategy document proposals of 4200 new homes by 2030. However 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.</p> <p>2. It is noted that over the 11 years previous there have been only 1500 new homes per annum so how does this equate to the need for 42,000 over the next 15 years – another flaw in the proposal.</p>	<p>1. The relevant plan is considered the Local Plan Core Strategy. The Local Plan Core Strategy is currently being considered through an Examination in Public. The CIL DCS has been worked up alongside the production of the Bradford District Local Plan Core Strategy in accordance with National Planning Practice Guidance. The council considers that the CIL is based on relevant and up to date evidence, in accordance with CIL Regulations.</p> <p>2. This comment relates the Local plan Core Strategy Housing requirement which is currently begin considered through an Examination in Public and is not considered relevant to the CIL DCS.</p>

0012	Smith	Local Councillor	<p>1. 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.</p> <p>2. We need to reuse homes 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.</p> <p>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 reduce the number of homes on that site. Recent Flooding should ensure the housing in the flood</p>	<p>1. This comment relates the Local plan Core Strategy which is currently begin considered through an Examination in Public and is not considered relevant to the CIL DCS.</p> <p>2. Comment noted. The council considers that the CIL is based on relevant and up to date evidence, in accordance with CIL Regulations.</p> <p>3. Comment noted. Following consultation on the CIL DCS the council intends to submit the CIL for examination by an independent inspector.</p> <p>4. Under CIL Regulations and NPPG, CIL rates must be in relation to economic viability and not policy objectives.</p>
------	-------	------------------	---	--

			<p>plains are reassessed.</p> <p>3. I am very appreciative of the Governments review of the CIL draft proposals by Councils especially by an independent inspector.</p> <p>4. 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.</p>	
0016	Pickles	Local resident	<p>The Consultation has not made use of the full scope of resources available, all possible avenues for public engagement should be used. There is a high reliance on the internet, and documents could have been made available at each local community outlet, to engage non internet users in outlying districts. The Plan-it Bradford publication is a good communication tool however, more guidance could be provided to generate response to key documents such as this</p>	<p>Consultation on the CIL Preliminary Draft Charging Schedule and Draft Charging Schedule has been undertaken in accordance with the CIL Regulations 2010 (as amended). This is set out in the supporting Statements of Consultation.</p> <p>The Council used a number of methods to invite people to make representations including letters/emails to relevant bodies and persons, and information included in press releases. In addition to the council's CIL website and main consultation website CIL consultation information was made available at the following locations:</p> <p>Main Council Offices Planning Reception, Jacobs Well, Bradford Shipley Town Hall, Keighley Town Hall,</p>

				<p>Ilkley Town Hall,</p> <p>Main Local Libraries Bradford City Library, Bingley Library, Keighley Library Ilkley Library</p>
0018	Thompson	Local resident	The Council cannot have complied with the legislation because the evidence it presented alongside its proposals was wrong and misled those being consulted.	The council consider that the CIL DCS is based on relevant and appropriate evidence in accordance with the Planning 2008 Act and CIL Regulations 2010 (as amended by the Localism Act 2011). The council have made available the relevant evidence as part of the consultation on the CIL PDCS and DCS.
Other comments				
0011	Ledger	Sport England	Section 9 – exemptions: welcome the reference to registered charities. Some sports clubs are indeed registered charities, however some are not. Where those sports clubs provide key community facilities and do not generate taxable profits could they also be considered for CIL exemption? Many sports clubs need to grow and adapt to remain sustainable which incrementally change changing accommodation, indoor spaces and playing fields.	Comment noted. The CIL Regulations set out the types of development exempt from CIL. New sports facilities are not proposed to have a CIL charge in the DCS.

0016	Pickles	Local Resident	<p>1. The CIL requires further review as a result of recent flooding issues, and further information and consultation should take place with bodies such as The Canal and River Trust.</p> <p>2. Consider the SHLAA needs re-appraisal in light of the above and priority placed on development on brownfield sites and areas which will show the least risk to local communities</p>	<p>1. The council consider the evidence in the LIP is appropriate and robust. The council have consulted with the Canal and Rivers Trust as part of the PDCS and DCS as set out in the statement of consultation and representation 0013 on the CIL DCS.</p> <p>2. The SHLAA forms evidence for the Local Pan Core Strategy. The CIL DCS is not part of the Local Plan. The CIL DCS is not a plan providing policies for the scale and location for development. This will be considered through the Local Plan Core Strategy and Allocations Development Plan Document. This comment is therefore not considered relevant to the CIL DCS.</p>
0018	Thompson	Local resident	<p>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.</p> <p>The representation provides a detailed examination of data underpinning various evidence documents associated with Bradford local plan which shows it is undeliverable for the following reasons:</p> <ul style="list-style-type: none"> - 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 and that it is 	<p>The CIL is not part of the Local Plan but sits alongside it.</p> <p>The CIL DCS is based on a relevant Local Plan the Bradford Core Strategy which is currently being considered through an Examination in Public. The CIL is not a plan providing policies for the scale and location for growth / housing delivery. This will be considered through the Local Plan Core Strategy and Allocations Development Plan Document.</p> <p>The CIL DCS has been informed by the LIP and Viability Assessment. It is considered that the LIP and Viability Assessment provide robust and</p>

			<p>currently blighted by stagnation and high levels of negative equity.</p> <ul style="list-style-type: none"> - 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. <p>These factors render it impossible to deliver housing (social and market) at the levels proposed in the Local Plan. They also render it impossible to deliver the CIL at the proposed rates and as a consequence the Infrastructure Plan is undeliverable.</p> <p>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.</p> <p>The representation 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</p>	<p>appropriate evidence to inform the CIL DCS.</p> <p>The council consider the proposed CIL rates strike an appropriate balance between the need to fund infrastructure and impact on viability of development based on the appropriate available evidence.</p>
--	--	--	---	---

			the record would be required to clarify whether there were further issues and what the implications of that might be.	
0018	Thompson	Local resident	<p>The council has overestimated the need for new housing and therefore the size of customer base for all types of housing but particularly market housing further inflating the Council's expectations regarding the sums that could be raised through CIL.</p> <p>Detailed evidence presented relating to projected jobs growth in relation to house building, Population Growth and Housing Requirements citing evidence in the Bradford Housing Requirement Study.</p> <p>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.</p> <p>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</p>	<p>The CIL DCS is based on a relevant Local Plan (the Bradford District Core Strategy) which is currently being considered through an Examination in Public.</p> <p>The CIL is not a plan providing policies for the scale and location for growth / housing delivery. This is outside the remit of the CIL charging schedule. This issue will be considered through the Local Plan Core Strategy and Allocations Development Plan Document.</p>
0023	Harrison	CLA	Concern the DCS indicates that the residential CIL rate will be levied on rural/agricultural workers dwellings. The Statement of Pre-Submission Consultation and Summary of	While CIL regulations allow certain exemptions for affordable housing and self-build housing, there is no requirement to exempt Rural

			<p>Representations states that there are exemptions in the CIL Regulations, which include affordable housing and self-build dwellings. Rural/agricultural workers dwellings are not affordable housing as the S106 Agreement will include specific occupancy conditions. Also, in some circumstance, the farmer will construct a dwelling for occupancy by a farm worker thus the self-build exemption eligibility would not be available.</p> <p>The Planning Inspectorate’s report to Wigan Council dated 28 August 2015 on their Draft Charging Schedule stated: <i>I also note the clear statement on other exemptions in paragraph 2.9 of the DCS, which should provide the necessary reassurance to those with concerns about how the charge will affect development such as agricultural workers dwellings, alternative forms of social housing and heritage assets.</i></p> <p>Paragraph 2.9 Exemptions and Relief of Wigan’s DCS states: <i>Agricultural workers dwellings where they are protected by a planning condition and/or a Section 106 Agreement from open market sale;</i></p> <p>Hope that Bradford MBC will consider including rural/agricultural workers dwellings in their list of exemptions.</p>	<p>Agricultural dwellings. Although provisions exist in the CIL regulations for the council to offer discretionary relief the advice is that such relief should only be granted in exceptional circumstances.</p> <p>If accommodation were being built for Rural/agricultural dwellings that met the requirements to qualify as Affordable Housing, CIL would not apply. Likewise CIL would not apply if the dwelling was a self-build development.</p> <p>In regards to viability it is acknowledged that a home with an agricultural occupancy will have a lower ‘end’ value. However it is important to note that there would be no land cost to such a development.</p> <p>The representor has not provided any additional viability evidence to support the suggestion that such properties would no longer come forward due to viability constraints of the proposed CIL rates.</p>
--	--	--	--	---