

City of Bradford Metropolitan District Council Community Infrastructure Levy
Draft Charging Schedule – Examination

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Mr Bhupinder Dev
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Dear Mr Dev

City of Bradford Metropolitan District Council Community Infrastructure Levy Draft Charging Schedule: Initial Questions.

I am now in a position to provide you with a number of observations following my initial assessment of the Draft Charging Schedule and the accompanying evidence, including the Viability Evidence Addendum (CIL/004). It would seem that further work may be required unless the Council is able to point to evidence which I may have overlooked.

From what I have read, it would seem that the viability testing has been predicated on a fixed density of development throughout the District. This appears to be inconsistent with the emerging CS which provides for varying densities of development dependent on location and the two emerging Area Action Plans which propose significantly higher levels of density.

The Council has set differential rates based on geographical zones for housing and for retail warehousing. However, whilst I note that some testing has been undertaken I could not identify the detailed evidence which supports the delineation of specific boundaries between the zones.

In addition, it would be useful to have a greater understanding of how the policy costs of the emerging Core Strategy and Area Action Plans, including for example, the use of national space standards, have been explicitly considered, and their impact on the viability of development.

The Council has provided a list of S106 monies received in the last five years¹. However, these figures do not appear to have been broken down on the basis of

¹ CIL/007

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category or scale of development, nor is there any indication, whether in the future, such funding would be expected to be sourced from CIL or S106/278 legal agreements, and how such figures have informed the allowance for S106 contributions which have been used in the viability studies.

The Infrastructure Delivery Plan sets out the quantum, and various categories of infrastructure required to implement the objectives of the emerging CS. I would appreciate confirmation that the IDP sets out the most up-to-date position relating to the required infrastructure and funding, and that it includes the infrastructure referred to within the two emerging Area Action Plans for Bradford City, and the Shipley and Canal Road Corridor.

I note the Council's agents have run a viability assessment for a care home and found that it would not be able to sustain any CIL. However, I have not been able to find any viability assessment for sheltered, specially designed accommodation for the elderly or similar development.

It would aid my understanding of the evidence underpinning the Draft Charging Schedule if there were clear links between the tables set out in the viability evidence and background information, including primary data where appropriate, such as base dates, figures and assumptions; for example, whether the threshold values relate to suburban, city centre or green field land. It would also greatly aid consideration of the evidence, if units of measurement were consistently applied. I would suggest that metric units be used.

I would be grateful if you could provide me with the Council's initial response to these concerns within the next ten days, and if the Council recognises further work would be required, an outline of how long it would take. Obviously, I would require further time to consider how to proceed.

Evidently, this letter only sets out my initial queries, and does not represent all of the issues which I may identify and on which I may seek further clarification. If you have any queries on the contents of this letter, please do not hesitate to contact me via the Programme Officer.

Yours sincerely

Louise Nurser

Examiner