

Further position statement.

BRADFORD COMMUNITY INFRASTRUCTURE LEVY 2016

Further to my representations put forward on 7th Feb 2016 and earlier on 11th Sept 2015

I note that a viability evidence addendum has recently been provided, however I still believe certain aspects have not been fully covered, I make the following comments;

Matter1 – No financial appraisal appears to have been carried out by CBMDC on the specific infrastructure requirements for Silsden. Particular concerning is an update regarding the drainage, flood mitigation identified by an actual occurrence in December 2015 as opposed to the theoretical assumptions previously used. Note this flood risk due to building on higher ground has been highlighted by local councillors on several occasions, before the events of December 2015. Please could the council provide an indication of what percentage of the funding gap, they expect the CIL contribution to provide. The writers estimate is that the current cost of providing suitable and sufficient infrastructure improvements is in excess of £45 million, whilst setting a low CIL rate may attract planning applications; poor infrastructure support will deter potential new residents. The CIL rates proposed were set using 2014 data and the housing market has since considerably improved (identified in the viability evidence addendum, in particular I note on one model site the CIL headroom has doubled, indicating there is scope for higher CIL contribution).

Matter 2 – Taking into account policies in both the Core Strategy and Local Infrastructure Plan, the level of levy does not appear to fully address the issues of Drainage, Transport, Habitat mitigation, Education and enhancement of community services. In practice community services are being cut for existing residents (library, toilets, bus services) and there appears to be no indication of possibly resurrecting the losses in the future. Note Silsden is designated as a Growth Centre serving both Airedale and Wharfedale; in particular links with Addingham were highlighted in the Core Strategy hearings earlier this year.

The Regulation 123 list is unclear with regard to the infrastructure funding required in Silsden, although it is realised that progress has been made regarding a new school, this in itself will necessitate road/access improvements to successfully safely deliver.

Density targets; the Core Strategy aims for a minimum of 30 dwellings per hectare, however the documents prepared by Cushman and Wakefield, appear to work on 35 dwellings per hectare, taking Silsden allocation of 1,200 and Addingham allocation of 200 and Steeton 700 new dwellings to year 2030. To increase to 35 units per Ha could have a significant effect on usage of the A6034, local drainage, facilities and proposed new site access roads. Due to topography, land drainage issues etc. the larger sites in Silsden are unlikely to feasibly deliver over 30 units per hectare.

Headroom; the earlier report by DTZ was based on the mid 2014 housing market new build completions etc., although NO site for appraisal /guidance (site specific viability analysis) was used in Silsden, the nearest being Site 11 Chapel St, Addingham (p153) and Site 15 Main St, Steeton (p177) neither of these present a true reflection of the Silsden housing market currently. (Indeed the value of a 3 bed in Steeton in 2015/16 has achieved £233,000 after discount (new 3 beds are achieving a 20 to 23% improvement /increase on those forecast sales figures in the 2014 data set)

Hence it would be prudent to carry out further appraisals of developments in the designated growth centres to improve the accuracy of the data set. These areas are critical to ensuring the right mix and type of housing is provided, require most investment from the local authority and developer contributions to ensure the growth centres are sustainable.

To simply split Silsden values by using the A6034 as a dividing line, is not reflective of the new house prices now being achieved in Silsden, which is closer to the figures being achieved in Addingham, indeed in the Core Strategy report the inspector identified Silsden as a hub for both Wharfedale and Airedale. Confirming the local housing market situation, practically experienced by local people and movement between the two communities.

Matter 3 – Site acquisition costs and land values were set using 2014 figures the updated viability evidence identifies considerable upward movement particularly in Value band 3, and highlights the need for further investigation. In particular sites in Silsden, new completions have realised a much higher figure than previous house sales in the area, this is due to some inward migration. Reference page 17 on VEA Amended Report from C and W, indicates this development would comfortably sit within Value Area 1 at £100sqm. This increase in value has also fed into other new house pricing in Silsden.

Affordable housing, it is common knowledge that housing associations are suffering from a lack of funding, and a recent case regarding the previously mentioned site in Steeton, saw the council having to accept a lower quota of affordable housing, the developer indicating that only one SHP had come forward with an offer. This increases the overall site financial margins/profit for the developer, however if this situation was repeated throughout the district, it could significantly reduce the available affordable housing in the key growth areas if no SHP is financially able or willing to take up offers from developers of the larger sites. Note also that in the addendum, professional fees an uplift of 3% has been applied (5% to 8% of costs) can this be justified?

Summary: Taking into consideration the findings in the addendum reference pages 3 to 7 identifies reasoning to uplift the CIL level for Silsden, taking into account the infrastructure needs to accommodate sustainable development as a growth centre. Page 8 confirms the market improvements generally and presents scope for re appraisal of the RVA, s boundaries between CIL value areas 1, 2 and 3. The re-appraisal of the Crack Lane site (Pages 9, 10 and 18) and the increased headroom using current price data, indicate it would be wise to appraise or re-appraise other sites particularly those in the identified growth centres. The Manor Fields site (Page15) has realised a considerably higher sales values than that anticipated in 2014. Note no sites in Silsden were previously appraised however the site figures for Crossfield View indicate value area 1 (charging zone 1) would be more appropriate than value area 2 (charging zone 2). The data for average house prices is only April 2011 to March 2014 period, significant increases in new build sales values from 2014 to 2016 are evident. The proposed charging levels do not presents an accurate reflection of the current residential sales activity in 2016. Further consultation should be had with all stakeholders in addition to the 20 contributors identified including Town/Parish Councils, Utility providers, Neighbourhood planning teams, transport providers.

Further Position Statement comments from Mr J.Pickles Sept 2016