Key Issues – Draft Charging Schedule consultation, October 2013

Numbers based only on respondents answering questions

Q 1 – agree with residential areas
Yes – 3
No – 4

Q 2 – agree with commercial areas
Yes – 3
No – 2

Q3 – suggested changes to areas
- No building on green belt
- Not considered that TWF and NPL can support combined AH, S106 and CIL at £70 per sqm – shouldn’t be in Zone 3
- Brownfield sites should be zoned as zero charge
- Significant residual requirement for S106 which has not been allowed for
- Exclude town centres and proposed extensions from commercial zone
- HCA welcomes CIL
- Edge of Hucknall should be Zone 1 to reflect Hucknall viability – evidence of sales prices submitted

Q4 – agree with residential charges
Yes – 2
No – 5

Q5 – agree with commercial charges
Yes – 2
No – 3

Q6 – suggested changes to charges
- Disagree with charge for residential extensions and self-build properties
- Confirm that CIL will replace S106s in their entirety
- Density assumptions optimistic
- Land values seem high – strategic sites purchased in bulk and at discount to reflect higher development costs
- Offsite infrastructure/abnormal costs seem to have been omitted
- Build costs – on the low side. Costs are rising - in the order of £85 per sq ft for large scale development
- Construction timescales (12 months) not realistic for larger sites
- Confirm that AH will get CIL relief
- Approach to staged payments needs to be set out more clearly
- Not considered that TWF and NPL can support combined AH, S106 and CIL at £70 per sqm
- TWF and NPL in rural zone for commercial and will make sites in Hucknall less attractive if ADC use CIL
- CIL charges may affect viability
• Approach to exceptional relief unclear – relief should be available if CIL affects viability.
• Like for like replacement of town centre sites may not occur if vacant for 6 out of the last 12 months
• Better to have a nil rating for A1 development
• should have a 15% reduction for brownfield sites
• support for nil rating for community uses
• suggest £35/sqm for Zone 2 and a lower rate for Zone 3
• CIL charge for retail will disadvantage retail compared to other town centre uses
• Instalment policy should not penalise those submitting full applications rather than outline
• Use of exceptional relief for strategically important development
• Adopt a flat rate level for all forms of development

Q7 – evidence base support CIL
Yes – 1
No – 4

Q8 – improvements to evidence base
• Introduction of CIL unproven – need case studies
• Use values for Hucknall in relation to TWF and NPL
• Need to substantiate all costs within IDP and ‘Existence of Infrastructure Gap’ document
• Need to prioritise the infrastructure requirements – focus on health, education and transport
• Recognise that strategic sites will deliver significant on site infrastructure
• Outline positive actions proposed by GBC to enable the delivery of major infrastructure using the Local Government Acts (2000 and 2003) (see CIL: An Overview paragraphs 17 and 18)
• Concern at scale of s106 alongside CIL especially for strategic sites (Swindon set CIL at zero for sites over 850 dwellings)
• NPL and TWF – no identification of costs other than education
• Need flexibility for CIL once in operation - review in light of what was collected through s106
• Need to account for s106 in CIL viability work – not done
• Review and updated heb work based on respondents own viability work (will share)
• Concern that unit numbers do not total correctly. Rerunning this with corrected figures reduces residual CIL amount by 15%
• Concern over uniform 12 month timescale for development – 100 units would take approx. 33mnths to build out
• Would expect greater level of detail in build costs – single amount for residential not appropriate
• Increase in build costs for Code for Sustainable homes requirement not factored in. Move from level 3 to level 4 increases build costs by between 5-6%
• Should attribute a s106 amount and then set viability buffer before setting a CIL rate
Assessments assumes that land used for AH is free - include a land value
Suggest a 30% viability buffer
Costs of opening up of TWF and NPL not allowed for.
Economy only just emerging from recession – risk CIL will affect delivery of development
Typo in section 5.0 – AH split should be 60/40 not 60/30
demolition costs, existing/alternative use and contamination largely ignored – need a mechanism to reflect this individually
evidence on sports & open space not up to date
inappropriate to set CIL based on partial understanding of the infrastructure costs
details of strategic site assessments not provided – should have consulted owners
should have used Viability Testing Local Plans (LHDG) as basis of viability assessments
no account for abnormal costs – on both brownfield and greenfield sites
sales/marketing fee and interest rate too low
12 month construction period in adequate – 30 dwellings per annum
No account of other policy requirements in assessments (s106)
No change to assessments since August 2012 – casts doubt on earnestness of exercise
Viability assessment underestimates costs of s106 associated with retail schemes – figures provided
Proposed changes to CIL – now better to delay CIL until enacted

Q9 – agree with R123 list
Yes – 2
No - 4

Q10 – changes to R123 List
Include other projects – not just GAR and secondary school
Secondary school at TWF should be via S106
Does not include £7million for the GAR
Question where figure for TWF school has come from – local school are Academies and would not cover cost of building a new school
Does not include several items identified in the IDP
Concerned at inevitable double counting – make clear that is not permitted by law
Consider opportunity to direct some CIL to local communities
Include ground rules for use of CIL for already committed (with pp) infrastructure schemes
HCA will work with GBC on GAR
Question why some transport schemes not included on R123 list
Consider funding pSPA mitigation from CIL
Extend to cover other categories such as education