

## **Appendix C**

### **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 inadequate – 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