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Representation # _____	

North Dorset Community Infrastructure Levy (CIL) Preliminary Draft Charging Schedule Consultation 24 July to 18 September 2015

Response Form

A preliminary draft charging schedule has been developed by the Council. This sets out the proposed charging rates for North Dorset and comments are now invited on the preliminary draft charging schedule. The consultation period starts on 24 July 2015 and ends on 18 September 2015. The consultation document and all supporting documentation can be viewed on the Council's web page below:

<https://www.dorsetforyou.com/northdorsetcil>

Please return completed forms to:

Email: planningpolicy@north-dorset.gov.uk

Post: Planning Policy, North Dorset District Council, Nordon, Salisbury Road, Blandford Forum, Dorset DT11 7LL

Deadline: Midnight on 18 September 2015. Representations received after this time may not be accepted.

Part A – Personal details

This part of the form must be completed by all people making representations as **anonymous comments cannot be accepted**. By submitting this response form you consent to your information being disclosed to third parties for this purpose, personal details will not be visible on our web site, although they will be shown on paper copies that will be sent to the Inspector and available for inspection.

*If an agent is appointed, please complete only the Title, Name and Organisation boxes to the personal details but complete the full contact details of the agent. All correspondence will be sent to the agent.

Personal Details (if applicable)*		Agent's Details (if applicable)*	
Title	Mr	Mr	
First Name	Paul	Shaun	
Last Name	Bedford	Pettitt	
Job Title(<i>where relevant</i>)		Director	
Organisation (<i>where relevant</i>)	████████████████████	████████████████████	
Address		████████████████████ ████████████████████	
Postcode		██████	
Tel. No.		██████████	
Email Address		████████████████████	

Part B – Representation

1. Do you agree that the evidence provided by Peter Brett Associates in their viability report and other supporting evidence is correct?

Yes

No

2. Do you agree that the CIL rates proposed (per square metre) strike an appropriate balance between the desirability of funding infrastructure through CIL and associated economic viability?

Yes

No

3. Do you believe that the Council should offer relief for any of the following discretionary matters?

Payment by installments (and what should these be?)

Relief for low cost market housing

Land and Infrastructure in-kind

Relief for exceptional circumstances

Relief for charitable investment activities

4. Do you have any views on the content of the Council's Preliminary Draft Regulation 123 list and the proposed balance between CIL and S106?

Yes

No

5. Your Comments.

Please provide alternative evidence or reasoning to support your view where necessary.

The North Dorset Whole Plan Viability and CIL Study was prepared prior to the Chancellor setting out in the Budget (08th July 2015) changes to the rent formula for all social housing rents, including affordable and social rents. The Government has said that the reversal of the rental formula, which currently allows HAs to raise rents in line with the consumer prices index (CPI) plus 1 per cent and forms a significant part of their investment profile, would result in a 12 per cent reduction in average rents by 2020/21. This in turn will have a direct knock-on effect to the transfer value capable of being paid by registered providers for completed affordable housing units.

The Viability Study confirms at para 8.2.5 that the viability assessment has been tested at 'current costs and current values', and assumed (at para 5.3.15) on this basis that affordable housing will command a transfer value to a registered provider at 55% of market value for affordable rent and 33% of market value for social rent.

Clearly the Government's changes to social housing rent outlined above will have a significant bearing on the viability of the CIL rates proposed, having regard to the reduction in the price able to be paid by registered providers for completed social housing units. Indeed, such impacts are likely to have greatest effect in areas of the District which command a lower sales revenue and where the differential between build costs and the transfer value of completed affordable housing units is at its narrowest, such as Gillingham.

It is therefore considered that the baseline assumptions set out in Appendix A of the viability study, specifically those relating to the transfer value of social rented housing, including both affordable and social rents, should be revised and the viability of each development typology reviewed in order to ensure that the policies set out in the draft Local Part 1, when taken together with the proposed rates of CIL, do not render development undeliverable.

In respect of discretionary matters, it is considered that there should be flexibility embedded within the Charging Schedule to enable CIL relief for discretionary matters, including land and infrastructure in kind. This is supported by Planning Practice Guidance which states that *'where an authority has already planned to invest levy receipts in a project there may be time, cost and efficiency benefits in accepting completed infrastructure from the party liable for payment of the levy. Payment in kind can also enable developers, users and authorities to have more certainty about the timescale over which certain infrastructure items will be delivered'*¹.

It is noted that the Council's Draft Reg 123 List refers to CIL payments being used to improve existing educational facilities, but with S106 contributions sought for *'education facilities that are directly related to a development (including Gillingham SSA)'*. Dorset County Council records (April 2015) show that, on the basis of existing class size requirements, Gillingham High School has a spare capacity of just 2 places². As a consequence, Dorset County Council as the Local Education Authority has confirmed that there will be a need to develop and enhance the Secondary School facilities and accommodation, and that the County Council has been looking for additional playing field land to supplement that which is currently available adjacent to the school³.

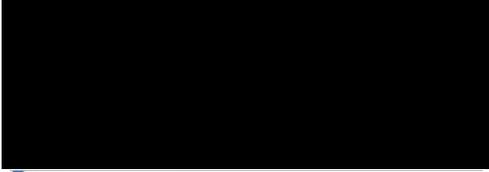
It is our understanding that this infrastructure is critical to the Plan, as defined through Appendix A of the Council's Infrastructure Delivery Plan, and directly related to the Gillingham SSA by virtue of the additional pupil numbers that will be generated by this development. However, it is not clear from the draft Reg 123 List whether the Council intends to deliver and fund improvements to Gillingham High School by means of CIL or S106. Clarification on this matter is sought from the Council.

Continue on a separate sheet if necessary

¹ Para 061 Ref ID: 25-061-20140612

² Para 2.1, MHD013

³ Para 2.4, MHD013



Signature: _____

Date: 11th September 2015

If submitting the form electronically, no signature is required.