



Community Infrastructure Levy

Schedule of the responses received on the Statement of Modifications
arising from the Examination of the Draft Charging Schedules



Prepared by Christchurch Borough Council and
East Dorset District Council

April 2015

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| Contact Person ID | Agent Name | Contact Organisation Details | Comment ID | Modification Number | Details of representation | Do you wish to be heard at the Public Examination? | Additional Documents? |
|-------------------|-------------------|---|-------------------------|---------------------|--|--|-----------------------|
| 898839 | Ms Elizabeth Boyd | Associate Director Tetlow King Planning on behalf of South West HARP Consortium | EFMDCS1 | EFM1 | <p>We represent the South West HARP Planning Consortium which includes all the leading Housing Association Registered Providers (HARPs) in the South West.</p> <p>Appended to our recent representation to the Further Modifications for the HARPs was our detailed justification for making the St Leonards Hospital site, in East Dorset, exempt from CIL (M5/0103-13 and M4/0514-15).</p> <p>We are pleased to see that that the Councils have accepted this and revisions have been made to the Charging Schedule in the form of modifications EFM1 to EFM5. Although the Councils' main driver is to avoid double counting for SANGs, it remains that there are wider viability issues presented in our evidence that would render a CIL charge unviable in respect of this strategic site's development.</p> <p>We therefore wish to express our full support for these new modifications. It is our intention to attend the resumed examination to ensure that the Examiner is reassured that this approach is supported and will be necessary to overcome issues raised previously. We have advised the Programme Officer of our intention.</p> | Yes | |
| 898839 | Ms | Associate | EFMDCS2 | EFM2 | We represent the South West HARP Planning | Yes | |

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| | Elizabeth Boyd | Director Tetlow King Planning on behalf of South West HARP Consortium | | | <p>Consortium which includes all the leading Housing Association Registered Providers (HARPs) in the South West.</p> <p>Appended to our recent representation to the Further Modifications for the HARPs was our detailed justification for making the St Leonards Hospital site, in East Dorset, exempt from CIL (M5/0103-13 and M4/0514-15).</p> <p>We are pleased to see that that the Councils have accepted this and revisions have been made to the Charging Schedule in the form of modifications EFM1 to EFM5. Although the Councils' main driver is to avoid double counting for SANGs, it remains that there are wider viability issues presented in our evidence that would render a CIL charge unviable in respect of this strategic site's development.</p> <p>We therefore wish to express our full support for these new modifications. It is our intention to attend the resumed examination to ensure that the Examiner is reassured that this approach is supported and will be necessary to overcome issues raised previously. We have advised the Programme Officer of our intention.</p> | | |
| 898839 | Ms Elizabeth Boyd | Associate Director Tetlow King Planning on behalf of South West HARP | EFMDCS3 | EFM3 | We represent the South West HARP Planning Consortium which includes all the leading Housing Association Registered Providers (HARPs) in the South West. | Yes | |

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| 898839 | Ms Elizabeth Boyd | Associate Director Tetlow King Planning on behalf of South West HARP Consortium | EFMDCS4 | EFM4 | <p>We represent the South West HARP Planning Consortium which includes all the leading Housing Association Registered Providers (HARPs) in the South West.</p> <p>Appended to our recent representation to the Further Modifications for the HARPs was our detailed justification for making the St Leonards Hospital site, in East Dorset,</p> | Yes | |

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| 898839 | Ms Elizabeth Boyd | Associate Director Tetlow King Planning on behalf of South West HARP Consortium | EFMDCS5 | EFM5 | <p>We represent the South West HARP Planning Consortium which includes all the leading Housing Association Registered Providers (HARPs) in the South West.</p> <p>Appended to our recent representation to the Further Modifications for the HARPs was our detailed justification for making the St Leonards Hospital site, in East Dorset, exempt from CIL (M5/0103-13 and M4/0514-15).</p> <p>We are pleased to see that that the Councils have accepted this and revisions have been made to the</p> | Yes | |

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| | | | | | <p>Charging Schedule in the form of modifications EFM1 to EFM5. Although the Councils' main driver is to avoid double counting for SANGs, it remains that there are wider viability issues presented in our evidence that would render a CIL charge unviable in respect of this strategic site's development.</p> <p>We therefore wish to express our full support for these new modifications. It is our intention to attend the resumed examination to ensure that the Examiner is reassured that this approach is supported and will be necessary to overcome issues raised previously. We have advised the Programme Officer of our intention.</p> | | |
| 891270 | Mr Stuart Tizzard | | EFMDCS6 | EFM1 | <p>with regard to determining the new level of CILS , when considering the matter, I would respectfully ask you to consider the overall impact on the economy and not just the amount or revenue Naturally the Local Authority are keen to raise as much money for local use on affordable housing, which is to be applauded, however ,as has been demonstrated in other areas, if the level of taxation is too high, this will have the effect of rendering infill schemes unviable.</p> <p>This ,in turn will mean that such schemes will not be taken up by, mainly local developers and will result in a reduced level of monies collected by the local authority.</p> <p>Not only will this mean lower levels of taxation, but sites and projects which would provide valuable housing needed to meet local needs, but, without such enterprise</p> | No Indication | |

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| | | | | | <p>the knock on effect on the local economy must be taken in to account.</p> <p>A previous study showed that ,in Dorset, that a third of employment was property related, and we must bear this in mind when looking at ensuring viability of developments projects.</p> <p>Local employment includes</p> <p>Ground Workers</p> <p>Brick Layers</p> <p>Carpenters</p> <p>Labourers</p> <p>Electricians</p> <p>Plasterers</p> <p>Plumbers</p> <p>Building material suppliers</p> <p>Kitchen suppliers and fitters</p> <p>Bathroom suppliers</p> | | |

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| | | | | | <p>Tilers</p> <p>Painter and decorators</p> <p>Landscapers</p> <p>Planners</p> <p>Plant Hire Companies</p> <p>Jobbing Builders</p> <p>Architects</p> <p>Structural engineers</p> <p>Surveyors</p> <p>Estate Agencies</p> <p>Lawyers</p> <p>Carpet Suppliers</p> <p>Carpet fitters</p> <p>Curtain Suppliers</p> <p>Furniture suppliers and shops</p> | | |

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| | | | | | <p>Etc Etc</p> <p>All of these people rely on local development projects and, in turn, spend their money locally, so the impact should the CILS be too high as to render projects unviable, is huge.</p> <p>New housing produces new community charges.</p> <p>I am a local developer and out of total building costs, over 50% goes on wages.</p> <p>I therefore ask that ,when assessing CILS, all the above is taken in to account. In my opinion CILS should be set at circa £7 per square foot for residential development.</p> <p>If you would like to consult me further then please let me know</p> | | |
| 891270 | Mr Stuart Tizzard | | EFMDCS7 | EFM2 | <p>with regard to determining the new level of CILS , when considering the matter, I would respectfully ask you to consider the overall impact on the economy and not just the amount or revenue Naturally the Local Authority are keen to raise as much money for local use on affordable housing, which is to be applauded, however ,as has been demonstrated in other areas, if the level of taxation is too high, this will have the effect of rendering infill schemes unviable.</p> <p>This ,in turn will mean that such schemes will not be taken up by, mainly local developers and will result in a</p> | No Indication | |

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| | | | | | <p>reduced level of monies collected by the local authority.</p> <p>Not only will this mean lower levels of taxation, but sites and projects which would provide valuable housing needed to meet local needs, but, without such enterprise the knock on effect on the local economy must be taken in to account.</p> <p>A previous study showed that ,in Dorset, that a third of employment was property related, and we must bear this in mind when looking at ensuring viability of developments projects.</p> <p>Local employment includes</p> <p>Ground Workers</p> <p>Brick Layers</p> <p>Carpenters</p> <p>Labourers</p> <p>Electricians</p> <p>Plasterers</p> <p>Plumbers</p> <p>Building material suppliers</p> | | |

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| | | | | | Kitchen suppliers and fitters Bathroom suppliers Tilers Painter and decorators Landscapers Planners Plant Hire Companies Jobbing Builders Architects Structural engineers Surveyors Estate Agencies Lawyers Carpet Suppliers Carpet fitters | | |

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| | | | | | <p>Curtain Suppliers</p> <p>Furniture suppliers and shops</p> <p>Etc Etc</p> <p>All of these people rely on local development projects and, in turn, spend their money locally, so the impact should the CILS be too high as to render projects unviable, is huge.</p> <p>New housing produces new community charges.</p> <p>I am a local developer and out of total building costs, over 50% goes on wages.</p> <p>I therefor ask that ,when assessing CILS, all the above is taken in to account. In my opinion CILS should be set at circa £7 per square foot for residential development.</p> <p>If you would like to consult me further then please let me know</p> | | |
| 359437 | Ms Gill Smith | Affordable Housing Officer Dorset County Council | EFMDCS8 | Other | <p>Thank you for consulting Dorset County Council on the Further Modifications to the Christchurch and East Dorset CIL Draft Charging Schedule as published in March 2015.</p> <p>The County Council does not wish to raise any comments on these modifications.</p> | No Indication | |
| 359272 | Mr Jonathan | Town Planning Consultant on | EFMDCS9 | EFM1 | The nil rate for sites providing on-site SANG does not satisfy national policy. CIL is to provide a range of | Yes | |

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| | Kamm | behalf of Clemdell Limited/Etchtree Limited | | | <p>infrastructure not simply SANG (as set out in the Council's Regulation 123 List)..</p> <p>The proposed Modification stands in stark contrast to the proposal to charge more than double the CIL per unit for sites of 10 units or less which is totally opposite to government policy. As is made clear in the Ministerial Statement of 28 November 2014 the purpose of the policy of exempting sites of 10 units or less was specifically to reduce the financial burden of s.106 obligations on these sites in the order of some £30,000 per unit. The proposed CIL rate of £150 psm is specifically a proposal to reverse national policy.</p> <p>In the light of this contradistinction a blanket nil rate for large (40+) sites is a complete flouting of national policy.</p> <p>Further there is no certainty that the level of exemption from affordable and other tariff charges will remain at 10 units so that small sites will be doubly burdened whilst larger sites would, if the Modification were accepted, remain exempt – that is unsound.</p> <p>It should be clarified in this Modification as to the distinction of a nil rate for sites of 40+ in this Modification and the threshold of “approximately 50” in EFM3.</p> <p>The provision of the land for a SANG should be offset against the CIL liability for that site and that charge should be calculated at the same rate per unit irrespective of the size of the site. It may be that the SANG effectively offsets the CIL liability but that must be</p> | | |

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| | | | | | calculated on a site-by-site basis by reference to Appendix C of the Consolidated Draft Charging Schedule. | | |
| 359272 | Mr Jonathan Kamm | Town Planning Consultant on behalf of Clemdell Limited/Etchtree Limited | EFMDCS10 | EFM2 | Objection as set out at EFM1 is repeated. | Yes | |
| 359272 | Mr Jonathan Kamm | Town Planning Consultant on behalf of Clemdell Limited/Etchtree Limited | EFMDCS11 | EFM3 | <p>The assumption that individual developments below 50 dwellings will not be required to provide their own SANG does not cater for the possibility that such developments may wish to provide their own SANG. SANG sites will be identified through Planning Applications and/or the Local Plan Part 2.</p> <p>Where developments of less than 40 units can deliver appropriate SANG for immediate use on its own, or with other such development, that would not otherwise be available to the public this benefit should be encouraged. To tie in with Appendix C of the Consolidated Draft Charging Schedule, EFM3 should state in clear terms that, for all development, payment of CIL by (inter alia) the provision of SANG is appropriate (to be read with Modifications EFM1 and EFM2 & the Objections thereto).</p> <p>Given that CIL does not apply to affordable dwellings, clarification is required in this Modification as to whether the numbers of dwellings referred to (40 or 50) includes or excludes affordable units (for example Land South of Burton (CN2) is CIL zero rated when projected to deliver</p> | Yes | |

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| | | | | | c.22 market units) | | |
| 359272 | Mr Jonathan Kamm | Town Planning Consultant on behalf of Clemdell Limited/Etchtree Limited | EFMDCS12 | EFM4 | <p>All development proposals (whatever the size) should be able to provide SANG (on-site or off-site) or affordable housing as a means of payment of CIL charges in lieu of a cash settlement. The proposed Modifications should make provision for this.</p> <p>Although the Modification deletes the words “s.106 Agreement” the semantic alteration simply underlines the conflict with national policy of not seeking contributions from small sites (10 or less)</p> | Yes | |
| 540139 | Mr Malcolm Brown | Sibbett Gregory | EFMDCS13 | EFM1 | <p>What a crazy world!</p> <p>£15,000 TAX to build a single 3 bedroom dwellinghouse. Nothing to pay for essential infrastructure if building 500 dwellings so long as a SANG is provided to offset harm to habitats! What about human habitat?</p> | No Indication | |
| 540139 | Mr Malcolm Brown | Sibbett Gregory | EFMDCS14 | EFM2 | <p>What a crazy world!</p> <p>£15,000 TAX to build a single 3 bedroom dwellinghouse. Nothing to pay for essential infrastructure if building 500 dwellings so long as a SANG is provided to offset harm to habitats! What about human habitat?</p> | No Indication | |