

SSDC CIL Hearing Additional Documents - response

Thank you for providing the opportunity to comment on the CIL hearing additional documents

AD1

Generally we consider the Council's new appraisals to be an improvement on those previously supplied and the explanation provided is clear. Although we could continue to debate slight variations in the percentages applied for the fees and developer's profit, the overall result is one that, in our opinion, broadly reflects the reality of the current situation.

We strongly believe that that specific opening up costs as described in the Harman report and evidenced at AD8 should be applied to strategic (and to a lesser extent other) sites in CIL viability testing, but we also acknowledge the Council's position paragraph 2.8 that including additional costs at this late stage which have not been subject to extensive consultation and local developer workshops poses a difficulty. We are therefore prepared to accept the revised appraisal for the purpose of assessment of CIL.

We would wish it to be made clear to all readers that SSDC's generic calculations have been undertaken purely for an assessment of CIL, and their figures do not necessarily reflect actual costs relating to any specific site.

AD3

I wish to make a correction to Table 1.

- The heading of the 4th Column refers to "Residual Value per developable acre". In the case of the Lufton Key Site the Residual Value was expressed as per Gross acre not net. We strongly suspect that this error has been repeated in respect of the other sites in this table, particularly Wyndham Park where the same parties were involved in the viability assessment and we can think of no reason that they would change their approach between the different sites.
- 5th column. The percentage of Affordable housing secured from the Lufton Key site was 17.5% not 20%.

In paragraph 3.6 the Council again refer to developable acre we believe this should be Gross acre for the reason expressed above.

Having said that, this paper does demonstrate that the Council has had considerable success in capturing planning gain obligations via Section 106 agreements, which we believe further supports our argument that the most sensible way to collect such revenue for strategic sites, where there is still a significant degree of uncertainty surrounding development costs, is by way of these agreements rather than through CIL, which, as the Council has demonstrated, could compromise the deliverability of housing from such sites.

We have no comments to make with regards to the other additional documents submitted.

Regards

Judith

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