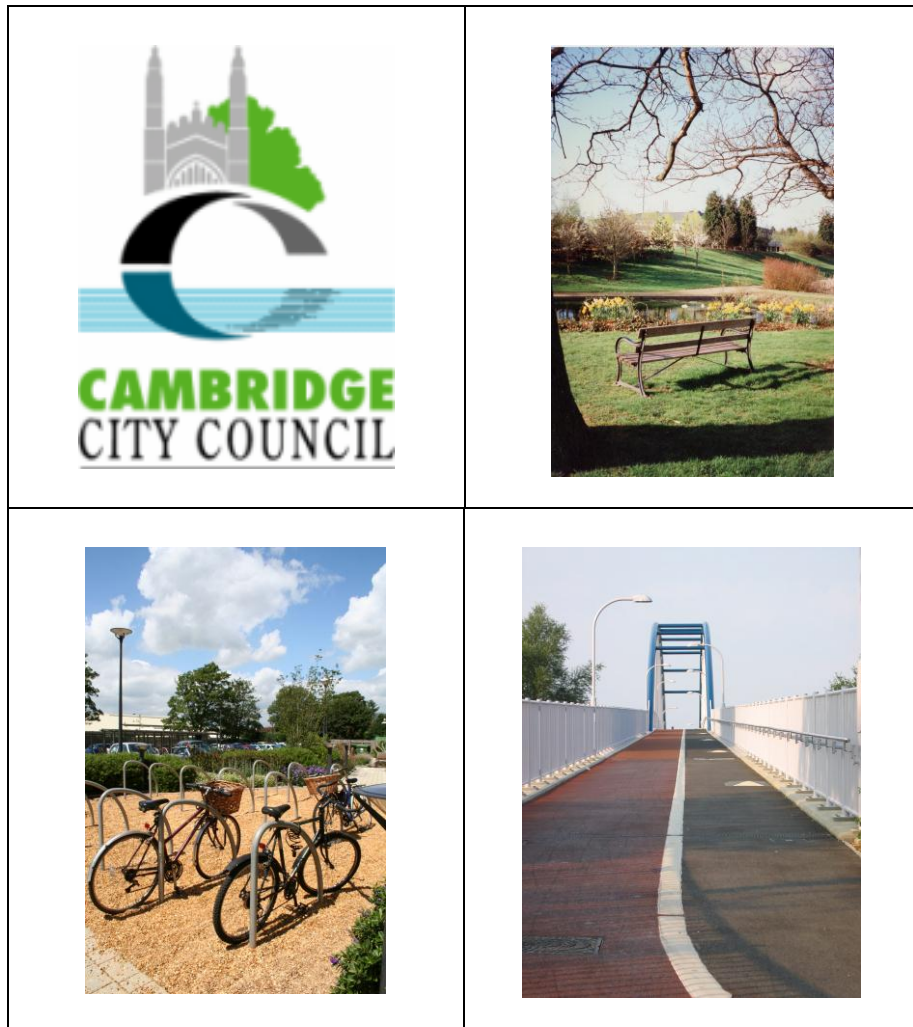


Cambridge Community Infrastructure Levy



Preliminary Draft Charging Schedule – Statement of Consultation (Draft Version)

October 2013

Preliminary Draft Charging Schedule - Statement of Consultation

1. Introduction

- 1.1 The purpose of this document, in line with the Community Infrastructure Levy Regulations (as amended), is to set out the consultation methods and engagement with the local community that has taken place in relation to the development of the Council's Community Infrastructure Levy (CIL).
- 1.2 In order for CIL to be adopted, it is required by the CIL Regulations 2010 (as amended) that the Council holds a minimum of two rounds of public consultation.
 - The first round of public consultation was the Preliminary Draft Charging Schedule (PDCS), which was carried out from 18 March 2013 and 29 April 2013
 - The second round of public consultation will be on the Draft Charging Schedule (DCS).
- 1.3 In addition, on 6 November 2012, the Council carried out a CIL engagement workshop with developers, commercial agents, planning agents and other interested stakeholders. This was an informal public consultation event, prior to the preparation of the DCS, that allowed the Council and its viability consultants to gauge the opinions of the developers, local community and other organisations with an interest in development in the city.
- 1.4 Regulations 15 and 16 of the CIL Regulations specify the consultation bodies that the Council must consult for the PDCS and DCS. The Council has consulted beyond the statutory minimum requirement to ensure that a wider range of consultation bodies were given the opportunity to make representations.

2. Consultation on Preliminary Draft Charging Schedule

- 2.1 The purpose of the PDCS was to allow developers, land owners, businesses and local communities to make representations on the initial proposed draft charging schedule for a CIL in Cambridge. This was the first stage of consultation required by the CIL Regulations. The consultation on the PDCS was held between 18 March 2013 to 29 April 2013.
- 2.2 The Council complied with Regulation 15 of the CIL Regulations in terms of the requirements for consultation on the PDCS. Regulation 15 sets out that a charging authority must send a copy of the PDCS to each of the consultation bodies, and invite them to make representations on it. In addition, the Council has also invited representations on the PDCS from persons who are residents or carry on business in the borough, including voluntary bodies and bodies that represent the interests of persons carrying on business in the borough.
- 2.3 The following methods of consultation were used:

- Public notice in the Cambridge Evening News 18/03/2013 (Appendix 3);
- Letter/e-mail notification to the consultees; and,
- Information about the consultation, including documents and how to respond, on the Council’s public website.

2.4 The locations of where the PDCS was made available for inspection:

- Cambridge City Council’s Customer Service Centre

Consultation Statistics

2.5 A total of 22 respondents made representations to this consultation and raised a total of 107 comments. The table below provide a breakdown of the type of respondent:

Table 1 – Type of CIL respondent

Type of Respondent	Number of Respondents
Developers or representatives	5
University of Cambridge and colleges/Anglia Ruskin Universtiy/Schools or representatives	7
Residents Associations/Parish Councils	1
Other agencies or authorities	7
Individuals	1

2.6 The PDCS consultation raised four key consultation questions. A summary of all comments received and detailed officer responses can be found at Appendix 1. The following is a broad summary of the key issues raised in response to the consultation:

<p>Question 1: Do you agree with the assumptions and methodology used in the CIL Viability Assessment? If not please explain why?</p> <p>Key Issues:</p> <ul style="list-style-type: none"> ○ Further work is required to relate the list of infrastructure projects and the delivery of the levels of growth proposed. The Infrastructure Delivery Study is aspirational rather than a route map for delivery ○ Detailed comments on the viability testing and assumptions used, including; professional fees; finance costs; build costs; S106; and fees ○ A viability buffer should be incorporated into the benchmark land value ○ Concerns were raised that the coloured tables used in the Viability Assessment are misleading. Request further explanation of the analysis of the results that was undertaken to arrive at CIL rates
<p>Question 2: Do you agree with the proposed CIL rates for, (a)residential development; (b) retail; (c) student accommodation, and; (d) all other uses?</p> <p>Key Issues:</p> <ul style="list-style-type: none"> ○ Detailed comments on the viability testing and assumptions used, including; professional fees; finance costs; build costs; S106; and fees ○ A single residential charging rate will jeopardise the delivery of housing in low

<p>value areas. There is no clear case for a single rather than a zoned level of CIL.</p> <ul style="list-style-type: none"> ○ The residential CIL rates proposed is too high, especially when composed with neighbouring districts ○ The retail rate should be zero ○ The student accommodation rate is too high ○ A nil rate on commercial premises is unrealistic given the buoyancy of the Cambridge market and the fact that S.106 monies have been received from commercial/office development in the past. All other uses should be making a sensible CIL contribution
<p>Question 3: Do you have any views on how the Council should apply an instalment policy (In accordance with Regulation 69b of the CIL Regulations)? Please give reasoning with your answers.</p>
<p>Key Issues:</p> <ul style="list-style-type: none"> ○ A Draft Instalment Policy should be published for comment at the Draft Charging Schedule Consultation Stage. The timing and scale of the initial and subsequent contributions should vary depending on the scale of the CIL liability. There should be an overriding mechanism in that where the CIL payment threatens the viability of a scheme it could be negotiated and agreed on a one to one basis ○ A charge in full should be levied at the assigned date to avoid deferrals experienced with S106 levies in the past ○ The 60 day collection period would be too short
<p>Question 4: Do you have any other comments on the PDCS or evidence base documents? Please provide reasoning with your answers.</p>
<p>Key Issues:</p> <ul style="list-style-type: none"> ○ The Council should review its approach to discretionary relief for charities. A discretionary policy would encourage investment and development ○ The interrelationship between CIL and S.106 including the connection between the proposed charges and infrastructure requirements – potential issues of ‘Double counting’ of S.106 contributions and CIL, which is not permitted by law ○ The Council should consult on a Draft Regulation 123 list as soon as possible to ensure the views of landowners and developers are taken on board ○ The Council should have a clear defined review mechanism ○ The Council should have an exceptional circumstances policy

3. Consultation on the Draft Charging Schedule

- 3.1 A consultation on the Cambridge Draft Charging Schedule (DCS) will take place from 28th October to 14th December 2013. The purpose of this round of consultation is to get the opinions of local communities, developers and businesses on the final proposed charging schedule.
- 3.2 In line with Regulation 16 of the CIL regulations, before submitting the DCS for Examination, the Council, as the Charging Authority (CA), is required to publish for

consultation the DCS along with the relevant evidence on infrastructure costs, other funding sources and economic viability. The CA is also required to publish a statement of the representations procedure, and a statement of the fact that the draft charging schedule and relevant evidence are available for inspection and of the places at which they can be inspected.

- 3.3 This will be the final stage of consultation before the Examination of the DCS, unless further modifications are required, prior to examination. Any further modifications would be subject to a separate consultation/notification process.

Appendix 1 – Summary and analysis of PDCS consultation responses

Question 1: Do you agree with the assumptions and methodology used in the viability assessment? If not please explain why.

Respondent	Rep. number	Summary of Response	Cambridge City Council Response
Savills on behalf of Anglia Ruskin University	25230	<p>Object.</p> <p>Greater clarity and transparency is needed in relation to the infrastructure requirements and potential options for funding. The IDS is aspirational rather than a route map for delivery.</p> <p>Further clarification is required on some of the underlying assumptions to ensure CIL does not threaten economic viability:</p> <p><u>Development Profit:</u> Agree that 20% of Gross Development Value (GDV) should be adopted</p> <p><u>Professional fees:</u> rate of 10% is too low, 12% would more accurately reflect our experience of</p>	<p>Noted. The IDS will be updated prior to the Draft Charging Schedule. The IDS was never intended to be an investment programme. The Council will consult on a Draft Regulation 123 list alongside the Draft CIL Charging Schedule. The list is not definitive, and in no order of priorities, as no formal decisions have yet been taken to confirm how CIL funds will be allocated amongst the listed infrastructure projects. It is a list of infrastructure that CIL could be used to fund, subject to Council priorities and the levels of available CIL funding.</p> <p>Ultimately, it will be necessary to prioritise both within theme areas (e.g. strategic transport) and also between theme areas (e.g. education or community facilities). Factors such as whether an infrastructure element is essential or even required by legal statute or regulation if a development was to go ahead would be taken into account.</p> <p><u>Development Profit:</u> Noted</p> <p><u>Professional Fees:</u> At 10% this is a well-established market norm. type assumption as appropriate for this level of study. As with all other</p>

Respondent	Rep. number	Summary of Response	Cambridge City Council Response
		<p>major developments</p> <p><u>Finance Costs:</u> In the current market fees for finance are higher than previously seen. An allowance of 7.5% for finance fees should be adopted.</p> <p><u>Build Costs:</u> Para 2.6.4 of the viability assessment states that 5.85% has been added to build costs to allow for sustainable construction costs. It is unclear what standard has been applied and we request clarification. Also note the appraisal for student accommodation only adds 5% for BREEAM and is therefore inconsistent</p> <p><u>S.106:</u> Greater clarity is needed on what will be funded through S.106 following the adoption of CIL.</p> <p>Under the residential commentary</p>	<p>assumptions, in practice the case specifics will vary but this is about making a suitable overview and has proven an appropriate and robust assumption for such studies. In also dealing with a wide range of scheme-specifics across the Country, DSP have found that overall this assumption lies in the range say 3 to 12%, but with most at 5 to 10% and lower to mid-range examples within this range not necessarily relating to smaller schemes. In the case of many larger schemes, whilst other costs aspects related to this area may grow, it is also likely that repetition of designs etc. will bring some balance to the overall costs picture</p> <p>Bearing in mind that this whole study process is not just about individual assumptions, it is most important to consider the collection of assumptions, how they interact and the overall approach taken to the appropriate high-level overview. In this context, it should also be noted for example that DSP has made an additional allowance for survey costs and has also varied the build costs contingency (increased from 5 to 7%) where considered appropriate.</p> <p>In DSP's view and experience, on balance the range 8 to 10% probably best summarises the placing of this fee costs assumption overall and, all in all, 10% represents a suitable position for it. In the usual way, site-by-site specific negotiations would pick up on the impact of any abnormal costs not usually dealt with specifically within the strategic overview.</p> <p><u>Finance Costs:</u> With DSP placing this assumption at 7.0% this represents a</p>

Respondent	Rep. number	Summary of Response	Cambridge City Council Response
		<p>£1000 per unit is suggested but, for example, under student residential accommodation no figure is given. 1% for Art needs to be factored into the appraisals if the Council intends to continue with the approach.</p> <p><u>Viability buffer:</u> A viability buffer should be incorporated into the benchmark land value. The inclusion of contingency costs within the viability appraisals provide a buffer against any changes in the costs of meeting new or emerging policy requirements such as higher environmental standards. This buffer also provides for any actual variations in costs over and above those used in the assumptions.</p>	<p>similar view to that put forward in the response. DSP would not expect to be consistent with all assumptions put forward by another party; variances to some degree are quite usual. An assumption at around 7% has not been queried or considered unsound in previous studies. In terms of DSP's experience across a range of site-specific appraisals reviewed, a range of 6% or less to 7-7.5% is seen; 7% being a suitable and representative market norm type assumption again. We are confident that the approach used and assumptions are reasonable in terms of making this viability overview.</p> <p><u>Build Costs:</u> It is considered that the assessment makes clear what has been assumed, noting that Appendix I to the viability assessment document is aimed to assist with an overview of assumptions too.</p> <p>In summary, the assumptions applied in respect of building cost enhancements for sustainability are:</p> <ul style="list-style-type: none"> ▪ Base assumption – CfSH4 costs assumed, by adding 5.85% to Part L Building Reg.s 2010 baseline. <p>In addition, the following allowances were added to the same baseline in respect of:</p> <ul style="list-style-type: none"> - A further 5.5% reflecting the Council's higher water efficiency proposals – equated to that aspect of CfSH5 estimated costs,

Respondent	Rep. number	Summary of Response	Cambridge City Council Response
			<p>and;</p> <ul style="list-style-type: none"> - £3,500 per dwelling reflecting an additional notional allowance for potential costs associated with the Council's policy development thinking at the time study assumptions were first considered. This may be regarded as a further potential contingency aligned to this or indeed any other costs area. ▪ Sensitivity testing – Full CfSH5 (or equivalent) costs represented by 15% added to the same 2010 baseline and again in conjunction with the £3,500/dwelling allowance for renewables/other cost. ▪ The similar level of cost enhancement (for sustainable construction factors) of 5% for BREEAM (compared with the base enhancement for CfSH4) is not inconsistent; as a non-residential scenario, and in common with the other non-residential / commercial scenarios testing, BREEAM was considered to be a more relevant and appropriate standard to reference - although in fact the cost addition assumption was very similar. The NHBC web-site states that 'BREEAM provides sustainability assessments for dwellings not covered by the Code, such as student accommodation and sheltered living, and non-dwellings such as offices, retail, schools and industrial units'. <p><u>S.106</u>: Noted, the Council intends to publish and consult on a Draft</p>

Respondent	Rep. number	Summary of Response	Cambridge City Council Response
			<p>Planning Obligations SPD prior to the examination of the Draft Charging Schedule. Further details of how S.106 will work alongside CIL is provided as an appendix to the Draft Charging Schedule Consultation document, this will form the basis for the planning obligations SPD.</p> <p><u>Viability Buffer:</u> DSP's consistent approach found robust following CIL EIPs to date is to look more widely at the aspect of cushioning / buffering, which is agreed to be a key aspect and reflected in the need not to set CIL rates at the margins of viability; but also noting that the CIL principles involve acceptance that all individual schemes will not be expected to remain viable.</p> <p>DSP's considered and robust approach is not simply to look at a maximum theoretical or similarly named type CIL rate (which may in itself only be theoretically achievable based on undeliverable assumptions) and then apply an arbitrary level of discount to that. DSP finds that can lead to a very wide range from which to pluck figures, and can also lead to unsustainable (but understandable) CIL rates expectations from local members and others given the full scale of infrastructure requirements associated with growth. Instead, DSP prefers and has reliably informed its client's CIL charging schedules based on a twofold approach to making sure that CIL rates are not set at the margins of viability, through:</p> <ol style="list-style-type: none"> 1. Realistic assumptions setting; including a layered approach to costs

Respondent	Rep. number	Summary of Response	Cambridge City Council Response
			<p>and the various contingencies, full profits allowances, sensitivities to values variations, etc., including as noted above.</p> <p>2. Review of the results generated from that in the context of a scale of sales values (Values levels – VLs) and potentially relevant land values. This is shown through the assessment’s results tables and is as described in the assessment text. The approach and process allows DSP and in this case the City Council to assess the confidence levels associated with the wide range of results, the relevance of particular results areas to local circumstances and Plan delivery; and therefore enables full consideration of the pros and cons associated with various potential CIL strategies given that there are often options to discuss in weighing-up the most appropriate local balance.</p>
Savills on behalf of Cambridge University Bursars’ Building and Planning Sub-Committee	25253	<p>Object.</p> <p><u>Development Profit:</u> Agree that 20% of Gross Development Value (GDV) should be adopted</p> <p><u>Professional fees:</u> rate of 10% is too low, 12% would more accurately reflect our experience of</p>	<p><u>Development Profit:</u> Noted</p> <p><u>Professional Fees:</u> See Cambridge City Council response to the representation (25230) from Savills on behalf of Anglia Ruskin on question 1 above.</p> <p><u>Finance Costs:</u> See Cambridge City Council response to the representation (25230) from Savills on behalf of Anglia Ruskin on question 1 above.</p>

Respondent	Rep. number	Summary of Response	Cambridge City Council Response
		<p>major developments</p> <p><u>Finance Costs:</u> In the current market fees for finance are higher than previously seen. An allowance of 7.5% for finance fees should be adopted.</p> <p><u>S.106:</u> Greater clarity is needed on what will be funded through S.106 following the adoption of CIL. At present there does not appear to be any S.106 accounted for in the appraisals</p> <p><u>Viability buffer:</u> A viability buffer should be incorporated into the benchmark land value. The inclusion of contingency costs within the viability appraisals provide a buffer against any changes in the costs of meeting new or emerging policy requirements such as higher</p>	<p><u>S.106:</u> Noted, the Council intends to publish and consult on a Draft Planning Obligations SPD prior to the examination of the Draft Charging Schedule. Further details of how S.106 will work alongside CIL is provided as an appendix to the Draft Charging Schedule Consultation document, this will form the basis for the planning obligations SPD.</p> <p>The s.106 assumption is £1000 per dwelling. This assumption in respect of s.106 alongside CIL is a typical assumption at this study level, as found suitable and robust in other cases; considered with the Council on the basis that CIL would largely replace s.106 and particularly across smaller and non-strategic type schemes as are representative of the planned supply. It is a separate assumption aside from build costs and so needs to be considered alongside the levels of other collective costs allowances; as does the £400,000/ha input for additional infrastructure works on the larger sites which is made in addition to the same level of build costs, build cost uplifts, external works and an independent s.106 allowance that has again been retained on the larger scheme scenarios (see Local Plan – CIL Viability Assessment section 2.10.1). From DSP’s experience it is debatable whether the full £400,000/ha allowance needed to be made at the scale of development scenarios appraised, nevertheless again the view taken was that the inclusion of the further costs at the very least added further contingency / buffering potential, and / or more generally reflected</p>

Respondent	Rep. number	Summary of Response	Cambridge City Council Response
		<p>environmental standards. This buffer also provides for any actual variations in costs over and above those used in the assumptions.</p> <p><u>Build Costs:</u> From the student accommodation appraisal the total costs for a 100 unit scheme is £4,334,670, which reflects £43,347 per room. In the experience of the BEPSC this is too low, especially bearing in mind (i) the heritage listed status of property in Cambs City Centre (ii) the long Term view the BEPSC take on student accommodation and (iii) high quality design requirements. We believe £110,000 to £130,000 is more appropriate and are happy to provide evidence at the appropriate time.</p>	<p>scenarios where such increased costs could be applicable.</p> <p><u>Viability Buffer:</u> See Cambridge City Council response to the representation (25230) from Savills on behalf of Anglia Ruskin on question 1 above.</p> <p><u>Build Costs:</u> As part of the stakeholders' consultation process (workshop, specific meetings in December 2012 and follow-up period) example values, costs and other information was sought from wider range of parties involved in the City development market, including from representatives of the University/Colleges at the stakeholders. No feedback was received in relation to information or examples regarding students related development as a result of that.</p> <p>Following the representation on behalf of the Cambridge University Bursars and Planning Sub-Committee the Council contacted the agent, again to request / invite further information on the build costs levels referred to in their representation. The information received in reply has been considered but was not comparable or informative for the CIL viability review purposes, being limited to whole scheme costs relating to a small refurbishment scheme undertaken some years ago. Whilst that scenario would not be CIL liable in any event, the figures provided were not suitable for comparison and did not further inform a new-builds cost view.</p> <p>In the absence of such locally specific information, as with other areas of</p>

Respondent	Rep. number	Summary of Response	Cambridge City Council Response
			the study, appropriately DSP has used the established key source of build cost assumptions for viability review purposes; BCIS – including a 13% uplift to base figures reflecting its Cambridge location adjustment factor.'
Savills on behalf of Marshall Group of Companies	25257	<p>Object</p> <p><u>Development Profit:</u> Note adoption of a development profit of 20% on Gross Development Value (GDV). However, we feel that 6% profit on cost for the affordable housing element is unrealistic and highlight a recent planning decision relating to Land at the Manor, Shinfield, Reading. DSP's inclusion of 20% profit on GDV for private housing and 6% profit on cost for affordable housing equates to a blended profit of 17.5% which is far too low.</p> <p><u>Professional fees:</u> rate of 10% is too low, 12% would more</p>	<p><u>Development Profit:</u> Across a wide range of site-specific reviews and negotiations, DSP has yet to come across a position robustly adhered to by a developer that involves seeking 20% profit on GDV across the market and affordable housing within a scheme. DSP are not familiar with all the background to the Shinfield case mentioned, but are not convinced of its relevance in this respect since the developer's proposal included only 2% affordable housing from 126 units so there would have been very little focus on applying a distinct profit level and very little difference made to outcomes if that had been done by the developer. It appears that the Inspector's thinking may have been based more on an absence of detail than on explicit profit positions noted in the housebuilder's evidence. We cannot be sure of the full facts, and in light of that would also query whether, at the levels stated, some of the higher profit levels may in fact have been based on % of cost and not GDV; a profit measure used by some. The picture from the case does not provide certainty, and in any event it is only one marker based on a particular set of circumstances and views; amongst a much wider range of scenarios where in our experience</p>

Respondent	Rep. number	Summary of Response	Cambridge City Council Response
		<p>accurately reflect our experience of major developments</p> <p><u>Finance Costs:</u> In the current market fees for finance are higher than previously seen. We welcome the adoption of a 7% finance rate</p> <p><u>S.106:</u> Greater clarity is needed on what will be funded through S.106 following the adoption of CIL. We believe that there is a gross underestimate of the cost of Section 106 contributions when assessing the viability of the CIL rates. This then feeds into an overestimate as to the scale of CIL that is viable.</p> <p>Information on the amounts raised in recent years through S.106 agreements and the extent to which affordable housing and other targets have been met</p>	<p>different assumptions have been accepted and relied upon.</p> <p>This view is reinforced by an Inspector's subsequent decision at White House Farm, Stokesley, N Yorks (APP/G2713/A/12/2179922) where it was stated that that 'The RICS guidance states that a developer's profit allowance should be at a level reflective of the market at the time and should include the risks attached to the specific scheme. With that in mind, the findings of the Inspector at a recent appeal [Shinfield] are of limited assistance in assessing the merits of this proposal. The same applies to the information provided by the Council as to profit levels in other schemes'.</p> <p>From this we consider that what one Inspector finds acceptable in one set of particular circumstances does not mean that should be viewed as appropriate for others regardless of the particular details.</p> <p>In DSP's long and recent experience of both strategic level viability studies it is inappropriate to allow for the full market profit level across the affordable housing as well. While DSP prefers the use of 6% profit based on affordable housing value (GDV), not just build cost, a significantly lower profit level on this scheme element has long been accepted as a market norm. approach as reflected in most appraisals and studies, regardless of their specific purpose. This convention, accepted on many previous occasions, has developed simply because the provision of the affordable housing is a very significantly (almost entirely de-risked) element of the overall scheme. It amounts to off plan sales, albeit at reduced revenue</p>

Respondent	Rep. number	Summary of Response	Cambridge City Council Response
		<p>should be produced in advance of the Draft Charging Schedule consultation</p> <p><u>Interpretation of Viability Assessment:</u> Concerns that the coloured tables are misleading. Concerns that the appraisals should be linked geographically to the planned land supply. Request further explanation of the analysis of the results that was undertaken to arrive at the suggested CIL rates. We do not feel that the evidence clearly demonstrates that the proposed rates of CIL would not jeopardise the delivery of planned land supply.</p> <p><u>Single residential charging rate:</u> The viability assessment reports the potential for three different charging rates across the city. In</p>	<p>levels compared with market figures; producing cash flow certainty at fixed points or even phased during construction depending on the delivery arrangements which are usually based on a form of partnership between the developer, RP and local authority.</p> <p>DSP and the Council are firm in the view that appropriate profit assumptions have been made. DSP does not recall the principles outlined in the preceding paragraph being a significantly disputed point or a major discussion area at any stage of its extensive viability case load. The convention used remains appropriate, hence its use by a range of viability practitioners.</p> <p><u>Professional Fees:</u> See Cambridge City Council response to the representation (25230) from Savills on behalf of Anglia Ruskin on question 1 above.</p> <p><u>Finance Costs:</u> See Cambridge City Council response to the representation (25230) from Savills on behalf of Anglia Ruskin on question 1 above.</p> <p><u>S.106:</u> See Cambridge City Council response to the representation (25253) from Savills on behalf of Cambridge University Bursars on question 1 above. The Draft Charging schedule consultation document contains a summary of S.106 agreed over the last number of years at Appendix A.</p>

Respondent	Rep. number	Summary of Response	Cambridge City Council Response
		<p>choosing to set a rate of £125/sq.m the evidence fails to show that the single proposed rate will not jeopardise the delivery of housing in low value areas. All of the land within the low value areas and a percentage within the medium value area.</p> <p><u>Viability buffer</u>: A viability buffer should be incorporated into the benchmark land value. The inclusion of contingency costs within the viability appraisals provide a buffer against any changes in the costs of meeting new or emerging policy requirements such as higher environmental standards. This buffer also provides for any actual variations in costs over and above those used in the assumptions.</p>	<p><u>Interpretation of Viability Assessment</u>: The coloured tables, as described, provide a guide to the results trends. DSP has used similar techniques for summarising results and trends on a large number of occasions now, including for CIL studies endorsed at EIP. DSP notes that other practitioners have also used similar ways of summarising and displaying results trends – viability impacts.</p> <p>The study assessment clearly describes the methodology including the relevance of the values levels (VLs), trial CIL charging rates, land value comparison levels / benchmarks (range of ‘Viability Tests’), their role in the review process and influence on results.</p> <p>The tables show how the many assumptions combinations of VL, AH% or other sensitivity and trial CIL rate play out to produce a range of residual land values (RLVs); and how the levels of those RLVs measure against the range of viability tests (comparisons with land values and ranges of those). The use of the scheme scenarios across the range of VLs helps to show the relevance of these assumptions and outcomes in respect of the likely nature of site supply, all as considered with the Council.</p> <p>As examples of the numerous scenarios, to further illustrate the meaning / interpretation of the findings and with the aim of informing this discussion:</p> <p>Appendix IIa, Table 1c – 10 flats scenario at VL3 meets viability test 4 i.e.</p>

Respondent	Rep. number	Summary of Response	Cambridge City Council Response
			<p>significantly exceeds the typical commercial land values range indicated, bearing in mind the likely host site type on many occasions – at all trial CIL rates to £200/sq. m, the CIL test limit. At VL4, viability test 5 is met (i.e. RLV exceeding existing residential use level comparison indicated at £2.9m/ha) across the range of CIL charges to £150/sq. m. At the 50/50 affordable housing tenure mix trial, the RLV is still well in excess of that viability test 5 level at £200/sq. m CIL.</p> <p>Appendix IIa, table 1h – 100 dwellings mixed housing development, possible occurrence in a range of locations / from a range of site types. In a greenfield scenario, from VL2 upwards the relevant viability test (1) is significantly exceeded at all trial CIL charging levels to the test limit of £200/sq. m. Viability test 2 (garden / amenity land) is exceeded at VL2 with CIL trialled to £175/sq. m, so that up to that CIL level RLVs competing with a range of former commercial site land values look to be achieved. VL2 represents lower-end values / beneath typical new-build levels. With VL3 assumed, the RLVs meet viability test 4 by exceeding the commercial land values range at all trial CIL levels to the test limit of £200/sq. m. At VL4, viability test 5 is exceeded with CIL at up to £175/sq. m.</p> <p><u>Single Residential Charging Rate:</u> As part of putting forward viable options and informing the development of the Council’s approach, as well as putting forward the single rate basis, the CIL Viability Assessment included</p>

Respondent	Rep. number	Summary of Response	Cambridge City Council Response
			<p>reporting on a potential option to consider a differential CIL rate for residential development, based on a 3-tier approach suggested at levels of £100, £125 and £150/sq. m by broad value area; with typically lower > mid > typically higher values. However, values in all areas were acknowledged to be variable and dependent on scheme-specifics. The CIL principles aim for simplicity; avoiding complication where it is not necessary.</p> <p>The Council considers it important to stress that ‘lower values’ and any related ‘lower viability’ is a relative scenario, in the context of the City’s high house prices. In general, across the City picture, development opportunities are sought after. As noted through the CIL Viability Assessment research into the new-build values that are relevant to this positive overall viability picture, and the related report detail, the incidence of values beneath the study’s value level 2 (‘VL2’) is considered to be limited; VL1 represents in the main a lower-end / falling market sensitivity test. The VL2 to VL4 values are those more typically seen in the lower to mid-value areas of this expensive City.</p> <p>CIL has a relatively small impact on viability. At the suggested rates it represents a small proportion of the gross development values (sales values) given the underlying strength of the City’s market; about 3.1 to 4.2% of GDV across the lower to mid values represented by VL3 to VL4 (approx. 3.5% on average). In this context, and looking at relative viability</p>

Respondent	Rep. number	Summary of Response	Cambridge City Council Response
			<p>influences, the recent market pick-up is also notable.</p> <p>As the viability assessment acknowledges, CIL in itself is highly unlikely to create non-viability at the rate proposed. Marginal or non-viability of any sites, which circumstances are considered to be seen infrequently, is usually inherent in the nature and characteristics of those sites, rather than a consequence of CIL. The relative impact of CIL compared with the wider viability influences is such that this inherent non-viability, where it is seen, would not usually be overcome even with a very limited or nil CIL.</p> <p>A single mid-range CIL charging rate, not pitched too high for the lower to mid value areas and given that it is not essential for all individual sites to remain viable, was considered a more appropriate solution; it better represents the mix and balance of local circumstances within the relatively small overall City area, and the blurring between very localised characteristics. The approach to stay within the higher rates that DSP and the Council consider could have been justified within the Council's charging schedule, as were mooted as part of an alternative differential route, respects the viability aspects within the overall question of seeking the right balance in setting up the CIL. The Council also considered the wider CIL implications, such as the difficulties associated with arriving at suitable differential rates boundaries (in itself telling in terms of weighing up the options), the clarity of the system, administrative side and potential</p>

Respondent	Rep. number	Summary of Response	Cambridge City Council Response
			<p>CIL receipts estimates. Along with the opposing tension to viability, of optimal contributions towards the scale of infrastructure needs through the identified funding gap, this all formed part of the consideration of balance and the selected single rate approach.</p> <p>The Council has carefully considered the distribution and type of sites expected to contribute to its overall land supply, benefitting also from the extensive review of sites viability carried out at an appropriate level and related to its SHLAA work. Whilst this always has to be accepted as an evolving picture that will be kept under review, at present it calculates that in terms of generally lower value areas, the overwhelming majority of dwellings in these areas are proposed for sites that either the finer-grained viability work indicated medium or high viability prospects for or are proposed for greenfield land without PDL type existing use value expectations (and in those cases without significant site-specific infrastructure requirements (s.106/278)).</p> <p>Overall, given the typical levels of viability expected to support development costs across the City, together with the blurring of characteristics and values over short distances within this quite compact urban area (including the difficulty in assigning some areas to a clear grouping), the single rate proposal is a fitting approach. This is all as discussed in the assessment report and has been arrived at after also</p>

Respondent	Rep. number	Summary of Response	Cambridge City Council Response
			<p>considering the way in which increasing property values tend to drive increasing land values; so that site value expectations in the lower value areas should reflect the inherent lower viability outcomes; with the higher property prices driving the opposite effect in higher value situations. These, together with the City's wider relationship to surrounding areas (and therefore again the need to avoid unnecessary multiple rates if possible), are also balancing factors to be considered. They add weight to the soundness of the single CIL charging rate position selected after careful assessment and review.</p> <p><u>Viability Buffer:</u> See Cambridge City Council response to the representation (25230) from Savills on behalf of Anglia Ruskin on question 1 above.</p>
Savills on behalf of Taylor Wimpey East Anglia and Barratt Homes Eastern Counties	25260	<p>Object.</p> <p><u>Development Profit:</u> Note adoption of a development profit of 20% on Gross Development Value (GDV). However, we feel that 6% profit on cost for the affordable housing element is unrealistic and highlight a recent planning decision relating to Land at the Manor, Shinfield,</p>	<p><u>Development Profit:</u> Noted. See Cambridge City Council response to the representation (25257) from Savills on behalf of Marshall Group of Companies on question 1 above.</p> <p><u>Build Costs:</u> The £1,062/sq. m quoted is a blended figure shown by the appraisal summary and reflecting a mix of houses and flats.</p> <p>A 10% net-to-gross adjustment has been used to effectively inflate the build costs input in respect of the flatted only elements of the schemes mentioned here; reflective of minimal common areas within typical simple</p>

Respondent	Rep. number	Summary of Response	Cambridge City Council Response
		<p>Reading. DSP's inclusion of 20% profit on GDV for private housing and 6% profit on cost for affordable housing equates to a blended profit of 17.5% which is far too low.</p> <p><u>Build Costs:</u> The build costs adopted by DSP for 100 and 250 unit typologies appear to be based on net internal floor areas rather than gross. Flats build costs should be based on gross internal floor area in order to take into account communal areas, such as corridors, stairs and lifts. Subsequently the build cost of £1,062/sqm is too low. In addition the appraisal of 50 flats does not make any allowance for basement car parking, which is usually a requirement on schemes of this</p>	<p>new build blocks not exceeding 3 stories, within mixed housing schemes of the type envisaged. We reiterate that the overall costs allowances are considered appropriate, and if anything more than sufficient given the approach to considering:</p> <ul style="list-style-type: none"> - BCIS plus locational index factor 13%; - Addition for external works (based on the indexed costs) typically at 15%; - Contingencies at 5-7%; input at 7% for the 50 units flatted scenarios - Additional allowances for sustainability and further contingency for renewable energy / similar (or other costs) – all as noted above; <p>Taking account of the net-to gross ratio, the flats build cost is £1,138/sq. m applied to the net floor area prior to external works; equivalent to £1,308/sq. m applied to the net area with externals. In gross area terms, as used, these equate to £1,024/sq. m prior to externals; £1,178/sq. m with externals.</p> <p>As can be seen at Appendix IIa table 1g, the strength of the results can be clearly seen - as relate to the 50 units typically high value apartments scenario referred to. By VL3, even at £200/sq. m CIL the RLVs significantly exceed the level indicated by viability test 5 (land at £2.9m/ha). In fact, we can see that those appraisals could bear significant further cost increases if</p>

Respondent	Rep. number	Summary of Response	Cambridge City Council Response
		<p>size</p> <p><u>Professional fees:</u> rate of 10% is too low, 12% would more accurately reflect our experience of major developments</p> <p><u>Finance Costs:</u> In the current market fees for finance are higher than previously seen. The consortium welcome the adoption of a 7% finance rate</p> <p><u>S.106:</u> The consortium believes that the £1,00 per dwelling S.106 cost allowed is incredibly low.</p> <p><u>Interpretation of Viability Assessment:</u> Concerns that the coloured tables are misleading. Concerns that the appraisals should be linked geographically to the planned land supply. Request further explanation of the analysis</p>	<p>that scenario were necessary in particular circumstances. As an example, however, a scheme that has basement car parking would usually involve reduced external works – there may be some balancing. In any event, DSP acknowledges that, as is appropriate, highly variable abnormal costs are not allowed for at this study level; so that, depending on their nature, particular excavations and works associated with aspects such as any underground car parking, for example, may well need to be factored into any necessary site-specific viability considerations as part of the Council’s and developer’s overall balancing of planning objectives. Please note again the high build costs contingency allowance (at 7%) applied notwithstanding these comments.</p> <p><u>Professional Fees:</u> See Cambridge City Council response to the representation (25230) from Savills on behalf of Anglia Ruskin on question 1 above.</p> <p><u>Finance Costs:</u> See Cambridge City Council response to the representation (25230) from Savills on behalf of Anglia Ruskin on question 1 above.</p> <p><u>S.106:</u> See Cambridge City Council response to the representation (25253) from Savills on behalf of Cambridge University Bursars on question 1 above.</p> <p><u>Interpretation of Viability Assessment:</u> Noted. See Cambridge City Council response to the representation (25257) from Savills on behalf of Marshall</p>

Respondent	Rep. number	Summary of Response	Cambridge City Council Response
		<p>of the results that was undertaken to arrive at the suggested CIL rates. We do not feel that the evidence clearly demonstrates that the proposed rates of CIL would not jeopardise the delivery of planned land supply.</p> <p><u>Viability buffer:</u> A viability buffer should be incorporated into the benchmark land value. The inclusion of contingency costs within the viability appraisals provide a buffer against any changes in the costs of meeting new or emerging policy requirements such as higher environmental standards. This buffer also provides for any actual variations in costs over and above those used in the assumptions.</p>	<p>Group of Companies on question 1 above.</p> <p><u>Viability Buffer:</u> See Cambridge City Council response to the representation (25230) from Savills on behalf of Anglia Ruskin on question 1 above.</p>

Respondent	Rep. number	Summary of Response	Cambridge City Council Response
Boyer Planning on behalf of Berkeley Homes	25234	<p>Object.</p> <p><u>Areas of Methodological weakness:</u></p> <p><u>Residential rate too high:</u> No other authority in the Greater Cambridge Area proposes to set a charge as high as Cambridge. Points out that Oxford have proposed a lower rate of £100/sq.m.</p> <p><u>Sales rates:</u> It is not clear whether regard has been had to assumed sales rates and the number of outlets associated with the potential allocation sites.</p> <p><u>Build Costs:</u> The viability assessment has adopted unrealistic build costs.</p> <p><u>S.106:</u> £1,000/sq.m per dwelling is light. The notional sum in relation to strategic sites of £400,000 per gross hectare would typically be</p>	<p><u>Residential rate too high:</u> The Council does not consider this is the case.</p> <p>Cambridge City has only a single immediate neighbour, it is surrounded by South Cambridgeshire; an authority for which DSP has also been working on viability.</p> <p>CIL charging rates all have to be set with regard to local circumstances and the balance considered correct in each charging authority's case. Key within these local characteristics is the strength of the value / costs relationships, the consideration of which is the crux of reviewing CIL viability and setting charging rates in balance with the level of infrastructure requirements. Even based on a very high level quick comparison, the proposed charging rate for the City is not excessive when looking at others. The comparisons are explained further once the strength of the City area market and resultant values begin to be considered relative to those in many surrounding areas. We would not expect to see identical rates, or necessarily rates at very similar levels. To make that assumption would be counter-intuitive suggests a bypassing of the dynamics of what viability and CIL is all about. We would expect to see a higher rate in Cambridge City to some extent, required but also underpinned by its very nature.</p> <p>In addition to the comprehensive approach to considering viability, the potential CIL rates were set out as %s of GDV (report section 3.10 / Figure</p>

Respondent	Rep. number	Summary of Response	Cambridge City Council Response
		<p>exceeded. It is unclear if allowance has been made for mandatory standards required by the Flood and Water Management Act 2013. The relationship between CIL and S.106, and in particular, affordable housing is one which needs to be considered carefully , in terms of the relative setting of both elements.</p> <p><u>Sustainability standards:</u> The appraisal seems to assume that all dwellings will be built to code level 4. Post 2016 sustainability requirements need to be taken into account</p> <p><u>Fees:</u> It is common for marketing costs to be in the order of 4% of market turnover as opposed the 3% assumed within the viability assessment. In relation to legal</p>	<p>12) to further inform the Council’s consideration of the level(s) to be set. It can be seen that at £125/sq. m the charge amounted to 4.17% GDV to 2.5% GDV across VLs 2 to 6; 3.5% to 2.78% across the md-values range VLs 3 to 5. At the level envisaged, the CIL charging rate is a modest proportion of overall scheme value in-line with DSP’s wider experience of involvement with and advising on suitable CIL charging levels. Allied to this, there are recent and current evidence for the continued strength of the City’s housing market, with a range of indications that house prices are increasing strongly; more so than in locations other than central London and to a degree that looks likely to have already out-stripped the above noted %s of GDV.</p> <p><u>Sales rates:</u> Yes, build and sales timings and durations have been considered. In the smaller sites appraisals this is more about sufficient allowances made for the periods over which costs are financed.</p> <p>As examples where this makes more impact on larger schemes, the 100 unit scenarios assume main construction over a 2 year (24 month) period; sales over 24 months but starting and completing later. The appraisal shows a private market sales rate of 2.4 per month, after allowing for the affordable homes sales. In the 250 dwellings scenarios, these take inputs take effect over off-set 5 year periods, showing a very similar market sales rate.</p>

Respondent	Rep. number	Summary of Response	Cambridge City Council Response
		<p>fees it is recommended that a per dwelling rate of £750 would be more appropriate, with at least 0.5% of market turnover allowed to cover conveyancing of the completed units alone.</p>	<p><u>Build costs:</u> We are confident that the approach used and assumptions are reasonable in terms of making this viability overview.</p> <p><u>S.106:</u> See Cambridge City Council response to the representation (25253) from Savills on behalf of Cambridge University Bursars on question 1 above.</p> <p><u>Sustainability Standards:</u> It is considered that the assessment makes clear what has been assumed, noting that Appendix I to the assessment document is aimed to assist with an overview of assumptions too.</p> <p>In summary, the assumptions applied in respect of building cost enhancements for sustainability are:</p> <ul style="list-style-type: none"> ▪ Base assumption – CfSH4 costs assumed, by adding 5.85% to Part L Building Reg.s 2010 baseline. <p>In addition, the following allowances were added to the same baseline in respect of:</p> <ul style="list-style-type: none"> - A further 5.5% reflecting the Council’s higher water efficiency proposals – equated to that aspect of CfSH5 estimated costs, and; - £3,500 per dwelling reflecting an additional notional allowance

Respondent	Rep. number	Summary of Response	Cambridge City Council Response
			<p>for potential costs associated with the Council's policy development thinking at the time study assumptions were first considered. This may be regarded as a further potential contingency aligned to this or indeed any other costs area.</p> <ul style="list-style-type: none"> ▪ Sensitivity testing – Full CfSH5 (or equivalent) costs represented by 15% added to the same 2010 baseline and again in conjunction with the £3,500/dwelling allowance for renewables/other cost. ▪ The similar level of cost enhancement (for sustainable construction factors) of 5% for BREEAM (compared with the base enhancement for CfSH4) is not inconsistent; as a non-residential scenario, and in common with the other non-residential / commercial scenarios testing, BREEAM was considered to be a more relevant and appropriate standard to reference - although in fact the cost addition assumption was very similar. The NHBC web-site states that 'BREEAM provides sustainability assessments for dwellings not covered by the Code, such as student accommodation and sheltered living, and non-dwellings such as offices, retail, schools and industrial units'. <p><u>Fees:</u> In DSP's experience, 3% is a suitable market norm assumption for the scenarios considered. In practice 3% is quite commonly used, including on site-specifics. 4% is an upper end assumption, not incorrect and sometimes seen within the overall range of assumptions on this – at say 1.5 to 6%,</p>

Respondent	Rep. number	Summary of Response	Cambridge City Council Response
			<p>although those figures are the extremes. Overall, 3% represents a suitable assumption.</p> <p>A per dwelling allowance is made, and this is placed at £750; a reasonable assumption within normal parameters.</p>
Cambridgeshire PCT	25216	Support. Agree with the contents of the Preliminary Draft Charging Schedule	Noted
Cambridgeshire County Council	25208	<p>Support. Cambridgeshire County Council agrees with the residual value approach and note that this approach has previously successfully been through examination 4 times and so has proven to be robust.</p> <p>CCC has not analysed specific evidence when considering the proposed charge rate, but would consider that the rates for CIL would appear to strike the appropriate balance between</p>	Noted.

Respondent	Rep. number	Summary of Response	Cambridge City Council Response
		<p>facilitating growth and provision of infrastructure. Although it should be noted that this will not cover full costs and there is likely to be a significant funding gap. Given viability issues, the County Council supports these rates subject to a review on an annual basis to address the viability gap and appropriate proportions of CIL revenue being agreed for County Council services.</p>	
Mr Jonathan Green	24760	<p>Object. The identification of core and outer core zones should be enabled: the central core merging the historic centre and commercial (CB1) and Leisure Park, an outer core determined by the ring road and another final, outer zone for growing the conurbation.</p>	<p>CIL can only be differentiated in this way based on clear viability evidence. The Viability Assessment does not demonstrate that differentiation is possible in this way. The charges proposed are considered to be reasonable and will enable the majority of development to come forward.</p>
Histon and	25223	Object.	1. The charges proposed are considered to be reasonable and will enable

Respondent	Rep. number	Summary of Response	Cambridge City Council Response
Impington Parish Council		<ol style="list-style-type: none"> 1. There is no allowance for changing expectations of return on land values 2. Having identified a possible range of £100 - £150, recommending £125 is a gross oversimplification 3. There is no clear case for a single, rather than a zoned, level of CIL 4. It does not allow for current contributions 	<p>the majority of development to come forward. Evidence is provided in a suite of viability documents produced on behalf of the council. These are The Cambridge City Council Local Plan – Community Infrastructure Levy Viability Assessment; The Cambridge City Council Local Plan - SHLAA and Potential Site Allocations High Level Viability Assessment; and, the Cambridge City Council Local Plan – Student Housing Affordable Housing Study (Summer 2013).</p> <ol style="list-style-type: none"> 2. See Cambridge City Council response to the representation (25257) from Savills on behalf of Marshall Group of Companies on question 1 above. 3. See Cambridge City Council response to the representation (25257) from Savills on behalf of Marshall Group of Companies on question 1 above. 4. The current system of contributions will be scaled back following the introduction of CIL. Appendix A of the Draft Charging Schedule Consultation provides further information on how CIL will work alongside S.106 following the adoption of CIL. The viability appraisals make allowance for a scaled back level of S.106 contributions. <p>The s.106 assumption is £1000 per dwelling. This assumption in respect of s.106 alongside CIL is a typical assumption at this study level, as found suitable and robust in other cases; considered with the Council on the basis that CIL would largely replace s.106 and particularly across smaller</p>

Respondent	Rep. number	Summary of Response	Cambridge City Council Response
			<p>and non-strategic type schemes as are representative of the planned supply. It is a separate assumption aside from build costs and so needs to be considered alongside the levels of other collective costs allowances; as does the £400,000/ha input for additional infrastructure works on the larger sites which is made in addition to the same level of build costs, build cost uplifts, external works and an independent s.106 allowance that has again been retained on the larger scheme scenarios (see Local Plan – CIL Viability Assessment section 2.10.1). From DSP’s experience it is debatable whether the full £400,000/ha allowance needed to be made at the scale of development scenarios appraised, nevertheless again the view taken was that the inclusion of the further costs at the very least added further contingency / buffering potential, and / or more generally reflected scenarios where such increased costs could be applicable.</p>
Dr Edward Lloyd Jenkins	24852	<p>Object.</p> <p><u>CIL rate too high:</u> I'm sure the levy set at £125 per sq m would be too high for a large swathe of residents in Romsey and therefore advocate a significant reduction, or alternatively, split the levels of levy</p>	<p>The CIL rates are based on clear evidence of viability, and based on well-established methodology. The charges proposed are considered to be reasonable and will enable the majority of development to come forward. Evidence is provided in a suite of viability documents produced on behalf of the council. These are The Cambridge City Council Local Plan – Community Infrastructure Levy Viability Assessment; The Cambridge City Council Local Plan - SHLAA and Potential Site Allocations High Level</p>

Respondent	Rep. number	Summary of Response	Cambridge City Council Response
		<p>more precisely into more definite areas of the city.</p>	<p>Viability Assessment; and, the Cambridge City Council Local Plan – Student Housing Affordable Housing Study (Summer 2013).</p> <p>In addition to the comprehensive approach to considering viability, the potential CIL rates were set out as %s of GDV (report section 3.10 / Figure 12) to further inform the Council’s consideration of the level(s) to be set. It can be seen that at £125/sq. m the charge amounted to 4.17% GDV to 2.5% GDV across VLs 2 to 6; 3.5% to 2.78% across the md-values range VLs 3 to 5. At the level envisaged, the CIL charging rate is a modest proportion of overall scheme value in-line with DSP’s wider experience of involvement with and advising on suitable CIL charging levels. Allied to this, there are recent and current evidence for the continued strength of the City’s housing market, with a range of indications that house prices are increasing strongly; more so than in locations other than central London and to a degree that looks likely to have already out-stripped the above noted %s of GDV.</p>
<p>South Cambridgeshire District Council</p>	<p>25240</p>	<p>SCDC has also appointed Dixon Searle Partnership (DSP) to undertake the relevant viability analysis of the District in order to inform SCDC's CIL charging</p>	<p>Noted</p>

Respondent	Rep. number	Summary of Response	Cambridge City Council Response
		schedule. SCDC readily acknowledge that the residual land value methodology adopted by DSP has been considered appropriate by CIL examiners and is consistent with the CIL Guidance December 2012.	

Question 2a – Do you agree with the proposed CIL rates for residential development? If not what do you think the rates should be and why?

Respondent	Representation number	Summary of Response	Cambridge City Council Response
Savills on behalf of Taylor Wimpey East Anglia & Barrat Homes Eastern Counties	25261	<p>The consortium has concerns relating to the assumptions used in the viability models and the interpretation of the evidence base when setting the proposed CIL rates. In particular,</p> <ul style="list-style-type: none"> • Build costs, particularly for flats; • Development profit for affordable housing; • Professional fees; • S106 costs; • The analysis of the land supply and the interpretation of the viability results; and • Viability buffer 	See Cambridge City Council response to the representation (25260) from Savills on behalf of Taylor Wimpey East Anglia & Barrat Homes Eastern Counties in relation to question 1 above.
Boyer Planning on behalf of Berkeley Homes	25235	The residential CIL rate is too high when compared to rates proposed, examined and adopted in neighbouring districts	See Cambridge City Council response to the representation (25234) from Boyer Planning on behalf of Berkeley Homes in relation to question 1 above.
Cambridgeshire PCT	25217	Agree with rates	Noted

Respondent	Representation number	Summary of Response	Cambridge City Council Response
Cambridgeshire County Council	25209	The County Council consider the proposed rates for residential as affordable given the buoyant market. Query whether differential charging zones should now be considered given the recent proposed reforms and the potential for different CIL rates for different sizes of development.	Noted. The CIL rates are based on clear evidence of viability, and based on well-established methodology. Differential CIL rates for different sizes of development cannot be considered. While a proposal to allow Charging Authorities to consider differentiating rates on this basis was part of a recent government consultation it is not known whether this proposal will form part of revised CIL regulations or when that will happen.
Darwin College	25199	Support	Noted
English Heritage	25249	Support. The approach taken seems reasonable	Noted
Histon and Impington Parish Council	25224	Object. The level should be zero.	The CIL rates are based on clear evidence of viability, and based on well-established methodology. The charges proposed are considered to be reasonable charges, which will still enable the majority of development to come forward within the city. Evidence is provided in a suite of viability documents produced on behalf of the council. These are The Cambridge City Council Local Plan – Community Infrastructure Levy

Respondent	Representation number	Summary of Response	Cambridge City Council Response
			<p>Viability Assessment; The Cambridge City Council Local Plan - SHLAA and Potential Site Allocations High Level Viability Assessment; and, the Cambridge City Council Local Plan – Student Housing Affordable Housing Study (Summer 2013).</p> <p>In addition to the comprehensive approach to considering viability, the potential CIL rates were set out as %s of GDV (report section 3.10 / Figure 12) to further inform the Council’s consideration of the level(s) to be set. It can be seen that at £125/sq. m the charge amounted to 4.17% GDV to 2.5% GDV across VLs 2 to 6; 3.5% to 2.78% across the md-values range VLs 3 to 5. At the level envisaged, the CIL charging rate is a modest proportion of overall scheme value in-line with DSP’s wider experience of involvement with and advising on suitable CIL charging levels. Allied to this, there are recent and current evidence for the continued strength of the City’s housing market, with a range of indications that house prices are increasing strongly; more so than in locations other than central London and to a degree that looks</p>

Respondent	Representation number	Summary of Response	Cambridge City Council Response
			likely to have already out-stripped the above noted %s of GDV.
Dr Edward Lloyd Jenkins	24853	Object. Too high for large numbers of households in certain areas of the city.	Noted. See Cambridge City Council response to the representation (25224) from Histon and Impington in relation to question 2a above. CIL will not be levied on individual households.
South Cambridgeshire District Council	25241	<p>SCDC does not disagree with the proposed residential rates.</p> <p>Whilst SCDC considers that there may have been a case for CCC to levy a higher residential CIL rate, not least having regard to the current level of funding secured through Section 106 agreements, SCDC recognises the proposed rate for each relevant area is a matter for the appropriate charging authority in terms of striking an appropriate balance.</p> <p>SCDC also acknowledges the guidance that the ability to develop viably the sites and the scale of development identified in the Local Plan should not be threatened by inappropriate CIL</p>	Noted. See Cambridge City Council response to the representation (25224) from Histon and Impington in relation to question 2a above.

Respondent	Representation number	Summary of Response	Cambridge City Council Response
		rates.	
Deloitte Real Estate on behalf of Universities Superannuation Scheme	25246	Whilst USS does not object to this approach, they request that the Council ensure that the proposed rate does not have a detrimental impact on viability of schemes and does not hinder development in the borough.	Noted. See Cambridge City Council response to the representation (25224) from Histon and Impington in relation to question 2a above.

Question 2b – Do you agree with the proposed CIL rates for retail development? If not what do you think the rates should be and why?

Respondent	Representation number	Summary of Response	Cambridge City Council Response
Cambridgeshire PCT	25218	Support	Noted
Cambridgeshire County Council	25210	Support. We consider the rates for retail affordable given the market conditions.	Noted
Darwin College	25200	Support	Noted
English Heritage	25250	Support. The approach seems reasonable	Noted
Histon and Impington Parish Council	25225	Object. The level should be zero.	Noted. The CIL rates are based on clear evidence of viability, and based on well-established methodology. The charges proposed are considered to be reasonable charges, which will still enable the majority of development to come forward within the city. Evidence is provided in a suite of viability documents produced on behalf of the council. These are The Cambridge City Council Local Plan – Community Infrastructure Levy Viability Assessment; The Cambridge City Council Local Plan - SHLAA and Potential Site Allocations High Level Viability Assessment; and, the Cambridge City Council Local Plan – Student

Respondent	Representation number	Summary of Response	Cambridge City Council Response
			<p>Housing Affordable Housing Study (Summer 2013).</p> <p>In addition to the comprehensive approach to considering viability, the potential CIL rates were set out as %s of GDV (report section 3.10 / Figure 13) to further inform the Council's consideration of the level(s) to be set. At the level envisaged, the CIL charging rate is a modest proportion of overall scheme value in-line with DSP's wider experience of involvement with and advising on suitable CIL charging levels.</p>

Question 2c – Do you agree with the proposed CIL rates for student accommodation development? If not what do you think the rates should be and why?

Respondent	Representation number	Summary of Response	Cambridge City Council Response
Savills on behalf of the University of Cambridge Bursars and Planning Sub-Committee	25254	Object. <u>Build Costs</u> . We note from the student accommodation appraisal that the total costs for a 100 unit scheme is £4,334,670 which reflects £43,347 per room. In the experience of the BEPSC, this is too low, especially bearing in mind (i) the heritage / listed status of Property in the Cambridge City Centre (ii) the long term view the BEPSC take on student accommodation and (iii) high quality design requirements. We believe a figure of around £110,000 - £130,000 is more appropriate, and if necessary, we would be more than happy to provide evidence at the appropriate time to the consultants.	Noted. See comments to Savills on behalf of Cambridge Bursars and Planning Sub-Committee in response to question 1
Cambridge Regional College	25264	Object. A CIL charge of £125/sq.m could seriously undermine the College's aspirations of providing student accommodation on site. The College believes that state sector educational providers should be excluded form	The CIL rates are based on clear evidence of viability, and based on well-established methodology. The charges proposed are considered to be reasonable charges, which will still enable the majority of development to come

Respondent	Representation number	Summary of Response	Cambridge City Council Response
		<p>CIL liability. They also point out that they may qualify for a mandatory exemption due to their status as a registered charity.</p>	<p>forward within the city. Evidence is provided in a suite of viability documents produced on behalf of the council. These are The Cambridge City Council Local Plan – Community Infrastructure Levy Viability Assessment; The Cambridge City Council Local Plan - SHLAA and Potential Site Allocations High Level Viability Assessment; and, the Cambridge City Council Local Plan – Student Housing Affordable Housing Study (Summer 2013).</p> <p>In addition to the comprehensive approach to considering viability, the potential CIL rates were set out as %s of GDV (report section 3.10 / Figure 13) to further inform the Council’s consideration of the level(s) to be set. At the level envisaged, the CIL charging rate is a modest proportion of overall scheme value in-line with DSP’s wider experience of involvement with and advising on suitable CIL charging levels.</p> <p>Development by charities for the delivery of their charitable purposes is exempt from a CIL charge under Regulation 43 of the CIL Regulations.</p>

Respondent	Representation number	Summary of Response	Cambridge City Council Response
Cambridgeshire PCT	25219	Support	Noted
Cambridgeshire County Council	25211	Support. We consider the rates for student accommodation as affordable given the current market conditions	Noted
English Heritage	25251	Support. The approach taken seems reasonable.	Noted.
Histon and Impington Parish Council	25226	Object. The level should be zero.	Noted. See response to Cambridge Regional College above in response to question 2c above.

Question 2d – Do you agree with the proposed CIL rates for all other uses? If not what do you think the rates should be and why?

Respondent	Representation number	Summary of Response	Cambridge City Council Response
Cambridge Regional College	25265	Support. The College welcomes the proposal that 'all of the development including B, C1, C2 and D Class Uses' will not on the basis of current expectations, be subject to a levy charge.	Noted
Cambridgeshire County Council	25212	Object. The County Council query the proposed nil rate on commercial /business premises and whether a charge isn't viable especially given the thriving local economy and specifically in those most sought after areas.	<p>The CIL rates are based on clear evidence of viability, and based on well-established methodology. The charges proposed are considered to be reasonable charges, which will still enable the majority of development to come forward within the city. Evidence is provided in a suite of viability documents produced on behalf of the council. These are The Cambridge City Council Local Plan – Community Infrastructure Levy Viability Assessment; The Cambridge City Council Local Plan - SHLAA and Potential Site Allocations High Level Viability Assessment; and, the Cambridge City Council Local Plan – Student Housing Affordable Housing Study (Summer 2013).</p> <p>Viability evidence has not demonstrated scope for</p>

Respondent	Representation number	Summary of Response	Cambridge City Council Response
			<p>a commercial/business charge. The viability results were typically poor for these scenarios, such that only the most favourable combinations of assumptions produced potentially viable scenarios, and then only in particular site and scheme circumstances which were not considered to be sufficiently consistent to support meaningful CIL charging. These findings are a reflection of the poor relationship between development values and costs, compounded by uncertain market conditions, and are consistent with a wide range of other Local Authority areas. DSP concluded that, regardless of any potential area based variation, viability would be unlikely to improve sufficiently to clearly evidence CIL charging scope for commercial uses (e.g. including potentially higher rental and capital values for some development forms in the heart of the city or in science park type locations). However, as with all CIL charging rates, this can be kept under review for subsequent charging schedules in light of economic circumstances and updated value cost relationships.</p>

Respondent	Representation number	Summary of Response	Cambridge City Council Response
Darwin College	25201	Support	Noted
English Heritage	25252	Support. The approach taken seems reasonable	Noted
Mr Jonathan Green	24761	Object. There should be a higher rate applied to non-retail business use, perhaps of £150 related to the greater impact on infrastructure, where the ROI is not to the City but may be to shareholders of businesses managed and domiciled elsewhere, in contradistinction to retail which supplies a service to the immediate area, as its rationale for building and operating in that location.	See response to Cambridgeshire County Council in relation to question 2d above.
Histon and Impington Parish Council	25227	Object. Setting a zero rate means that the current contributions to the Corridor Area Transport Plans (e.g. Northern at £399 per trip, independent of class use) will not be made. Class (d) – all other uses should be at the bare minimum, be making a sensible contribution to	Once CIL has been introduced tariff based contributions of this nature become unlawful.

Respondent	Representation number	Summary of Response	Cambridge City Council Response
		transport plans	
South Cambridgeshire District Council	25242	<p>Object. SCDC is aware that section 106 monies are being secured from commercial/office developments for matters such as transport improvements. SCDC is conscious that the proposal by CCC to have a commercial CIL rate at nil will mean that monies that could reasonably be expected to result from commercial/office development will be lost.</p> <p>SCDC would be keen to understand how CCC intend using section 106 agreements to fund site specific infrastructure and in particular any strategic sites that may result from their new local plan, and to continue to develop a joined-up approach in this regard.</p>	<p>See response to Cambridgeshire County Council in relation to question 2d above.</p> <p>The Council intends to publish and consult on a Draft Planning Obligations SPD prior to the examination of the Draft Charging Schedule. The Draft Charging schedule consultation document contains a summary of S.106 agreed over the last number of years at Appendix A.</p>
Sport England	25237	Support. Sport England supports the proposed draft CIL charging rates as they exclude any development relating to new or existing sites for indoor or outdoor sport, such as playing fields, tennis courts, bowling greens, sports halls, swimming pools and health and fitness	Noted

Respondent	Representation number	Summary of Response	Cambridge City Council Response
		centres. All these sites usually fall within Use Class D2 which is specifically excluded from the charging schedules, and I assume that sporting uses that fall outside Use Class D2 (for example sites for motor sports, shooting ranges etc.) will also be exempt.	
The Theatres Trust	25206	<p>We support a nil rate in Table 2 for 'All other developments'. Please note for clarity that theatres are also sui generis, although not related to retail uses, as they are frequently erroneously designated D2.</p> <p>Theatre uses are generally unable to bear the cost of CIL for viability reasons. The Theatres Trust recommends either the setting of a nil rate, the application of charitable or discretionary reliefs, applying D1/D2 rates where differential rates are proposed, or recycling the charge to the theatre development where a single rate is proposed.</p>	Noted
University of	25205	The University supports the proposed nil rate	Noted

Respondent	Representation number	Summary of Response	Cambridge City Council Response
Cambridge		for academic and research development.	
Deloitte Real Estate on behalf of Universities Superannuation Scheme	25247	With regards to the proposed B, C1, C2 and D use class rate, USS welcomes the rate of £0 per square metre.	Noted

Question 3 – Do you agree have any views on how the Council should apply an instalment policy (in accordance with Regulation 69b of the CIL Regulations)? Please give reasoning with your answers.

Respondent	Representation number	Summary of Response	Cambridge City Council Response
Savills on behalf of Anglia Ruskin University	25231	<p>Object. A draft instalment policy should be published for comment at the Draft Charging Schedule consultation stage.</p> <p>In determining a suitable Instalments Policy, we would recommend that the initial contribution (%) payable at the commencement of development should vary depending on the scale of the total CIL payment due. The timing and proportion of subsequent payments should then also vary by the scale of the CIL liability.</p> <p>There should be an overriding mechanism which, in certain situations should the CIL payments threatens the viability, and thus the deliverability of the scheme proposed, can be negotiated and agreed on a one-to-one basis.</p>	Noted. The Council will publish a Draft instalment policy alongside the Draft CIL Charging Schedule. The introduction of an overriding mechanism whereby CIL payments could be negotiated and agreed on a one to one basis is not within the scope of the CIL Regulations (see Regulation 70 of the CIL Regulations 2010 (as amended)).
Savills on behalf of the University of	25255	Support. We strongly recommend that CCC publish draft instalment policies for comment	Noted. The Council will publish a Draft instalment policy alongside the Draft CIL Charging Schedule.

Respondent	Representation number	Summary of Response	Cambridge City Council Response
Cambridge Bursars' and Planning Sub-Committee		<p>at the Draft Charging Schedule consultation stage, if not before.</p> <p>We would recommend that the initial contribution (%) payable at the commencement of development should vary depending on the scale of the total CIL payment due. The timing and proportion of subsequent payments should then also vary by the scale of the CIL liability.</p> <p>There should be an overriding mechanism which, in certain situations should the CIL payments threatens the viability of the scheme proposed, can be negotiated and agreed on a one-to-one basis.</p>	<p>The introduction of an overriding mechanism whereby CIL payments could be negotiated and agreed on a one to one basis is not within the scope of the CIL Regulations (see Regulation 70 of the CIL Regulations 2010 (as amended)).</p>
Savills on behalf of Marshalls Group of Companies	25258	<p>Object. We recommend that CCC publish a draft instalment policy for comment at the Draft Charging Schedule consultation stage.</p> <p>We would recommend that the initial contribution (%) payable at the commencement of development should vary</p>	<p>Noted. The Council will publish a Draft instalment policy alongside the Draft CIL Charging Schedule. The introduction of an overriding mechanism whereby CIL payments could be negotiated and agreed on a one to one basis is not within the scope of the CIL Regulations (see Regulation 70 of</p>

Respondent	Representation number	Summary of Response	Cambridge City Council Response
		<p>depending on the scale of the total CIL payment due. The timing and proportion of subsequent payments should then also vary by the scale of the CIL liability. This should include a mechanism to allow the timing of CIL payments to be negotiated and agreed on a one-to-one basis in certain situations where CIL payments threaten the viability and deliverability of a scheme.</p>	<p>the CIL Regulations 2010 (as amended).</p>
<p>Savills on behalf of Taylor Wimpey East Anglia & Barratt Homes Eastern Counties</p>	<p>25262</p>	<p>Object. A draft instalment policies be published for comment at the Draft Charging Schedule consultation stage.</p> <p>In determining a suitable Instalments Policy, we would recommend that the initial contribution (%) payable at the commencement of development should vary depending on the scale of the total CIL payment due. The timing and proportion of subsequent payments should then also vary by the scale of the CIL liability.</p> <p>There should be an overriding mechanism</p>	<p>Noted. The Council will publish a Draft instalment policy alongside the Draft CIL Charging Schedule. The introduction of an overriding mechanism whereby CIL payments could be negotiated and agreed on a one to one basis is not within the scope of the CIL Regulations (see Regulation 70 of the CIL Regulations 2010 (as amended)).</p>

Respondent	Representation number	Summary of Response	Cambridge City Council Response
		<p>which, in certain situations should the CIL payments threaten the viability, and thus the deliverability of the scheme proposed, can be negotiated and agreed on a one-to-one basis.</p>	
Cambridgeshire County Council	25213	<p>Support. The County Council would welcome the opportunity to work with the City Council on an instalments policy once a charging schedule is adopted.</p>	<p>Noted. The Council will publish a Draft instalment policy alongside the Draft CIL Charging Schedule.</p>
Mr Jonathan Green	24762	<p>Object. A charge in full should be levied, at the assigned date, to avoid the deferrals experienced with S106 levies of the past, as with CB1, to underwrite the guarantee of provision, for example, of Green Space which should be exactly related to the metre squared assessed. The minimum standards for Green Space should be increased significantly and mandatory, for all developments, to attenuate the underprovision in past development programmes. Provision should be made even at the cost of a reduced footprint for the build, including roof terraces and other forms</p>	<p>Noted. There is no clawback period for CIL. The CIL Charging Schedule does not have the remit to change Open Space standards.</p>

Respondent	Representation number	Summary of Response	Cambridge City Council Response
		besides ground level.	
Histon and Impington Parish Council	25228	<p>Object. Whilst instalments would be acceptable, it is clear that this is not simple.</p> <p>It would be reasonable to expect there to be an initial component, with the remainder related to site occupation, size and key site requirements. It is unlikely that any standard instalment plan can therefore be established.</p> <p>It is difficult to see how this can be achieved in a meaningful and simple manner, which leads to the conclusion a policy of no instalments should be adopted.</p>	Noted. CIL Regulations require that instalments policies are linked to date, not site occupations or requirements (see Regulation 70 of the CIL Regulations 2010 (as amended)). The Council will publish a Draft instalment policy alongside the Draft CIL Charging Schedule.
Dr Edward Lloyd Jenkins	24873	Object. The 60 day compulsory collection period would be too short for people resident in some city areas! A six month period would cause much less friction and hardship	Noted. The purpose of an instalment policy is so that developers/site owners to finance their project in an efficient manner.
South Cambridgeshire District Council	25243	Support. As the premise of the CIL Regulations is to provide the development industry with certainty and consistency SCDC feels that an instalments policy could helpfully be worked	Noted

Respondent	Representation number	Summary of Response	Cambridge City Council Response
		up closely between the two charging authorities. SCDC would hope that agreement could be reached in such regard following the close of the PDCS consultation and ahead of the District Council consulting on its own PDCS.	

Question 4 – Do you have any other comments on the PDCS or evidence base documents? Please provide reasoning with your answers.

Respondent	Representation number	Summary of Response	Cambridge City Council Response
Savills on behalf of Anglia Ruskin University	25232	<p>Object.</p> <p><u>Discretionary Charitable Relief:</u> The Council should review its approach to discretionary relief for charities - management and administrative capacity is not a sufficient barrier to prevent a discretionary policy. A discretionary policy would encourage investment in development.</p> <p><u>Review & Monitoring:</u> Regular monitoring is key, to ensure CIL does not stifle development in the right locations</p> <p><u>The relationship between S.106 and the CIL:</u> The charging schedule should be clear that 'double counting' of Section 106 contributions and CIL is not permitted by law.</p> <p><u>Reg 123 List:</u> The Council should consult on a Draft R.123 list as soon as possible to ensure the views of landowners and developers can</p>	<p><u>Discretionary Charitable Relief:</u> The Council is not obliged or does not intend to introduce a discretionary charitable relief policy at this stage. This is something the Council will keep under review as the CIL system beds in.</p> <p><u>Review and monitoring:</u> The CIL Regulations include detailed requirements for monitoring.</p> <p>As required by Regulation 62, the City Council will publish an Annual CIL Report (for the financial year), which shows:</p> <ul style="list-style-type: none"> • The amount of CIL collected • The amount of CIL that has been spent • Information on how CIL funds have been spent (i.e. which infrastructure projects, and how much has been used to cover administrative costs) • The amount of CIL retained at the end of the reporting year. <p><u>The relationship between S106 and CIL:</u> Noted, the Council intends to publish and consult on a Draft</p>

Respondent	Representation number	Summary of Response	Cambridge City Council Response
		be taken on board.	<p>Planning Obligations SPD prior to the examination of the Draft Charging Schedule. Further details of how S.106 will work alongside CIL is provided as an appendix to the Draft Charging Schedule Consultation document, this will form the basis for the planning obligations SPD.</p> <p><u>Draft R.123 List:</u> Noted. The Council will consult on a draft R.123 list alongside the Draft CIL Charging Schedule.</p>
Savills on behalf of the University of Cambridge Bursars' and Planning Sub-Committee	25256	<p>Object</p> <p><u>Infrastructure Delivery Study:</u> Further work is required to relate the IDS list of projects, their potential funding and delivery of growth</p> <p><u>Discretionary Charitable Relief:</u> There is a need for a discretionary relief policy due to the characteristics of the Cambridge Colleges activities which are often complex. Due to the unique characteristics of the Cambridge market it is considered crucial that CCC bring in a discretionary policy so that this facility will</p>	<p><u>Infrastructure Delivery Study:</u> An update to this study has been carried out since the Preliminary Draft Charging Schedule consultation. This identified a 'CIL Liable' list of infrastructure and funding gap.</p> <p><u>Discretionary Charitable Relief:</u> The Council is not obliged or does not intend to introduce a discretionary charitable relief policy at this stage. This is something the Council will keep under review as the CIL system beds in.</p> <p><u>The relationship between S106 and CIL:</u> The Council</p>

Respondent	Representation number	Summary of Response	Cambridge City Council Response
		<p>allow developments meeting Regulation 44 to be assessed on their own merits.</p> <p><u>The relationship between S.106 and the CIL</u> should be clear to avoid double counting.</p> <p><u>Payments in kind:</u> We are pleased to see that CCC has agreed to use a payment in kind mechanism</p> <p><u>Review & Monitoring:</u> The authority should have a clearly defined review mechanism. Monitoring data and reviews should be regularly published, for example on the Councils' website. Regular monitoring is key, to ensure that CIL does not stifle development in the right locations.</p>	<p>intends to publish and consult on a Draft Planning Obligations SPD prior to the examination of the Draft Charging Schedule. Further details of how S.106 will work alongside CIL is provided as an appendix to the Draft Charging Schedule Consultation document, this will form the basis for the planning obligations SPD.</p> <p><u>Payments in kind:</u> Noted</p> <p><u>Review & Monitoring:</u> The CIL Regulations (Regulation 62) include detailed requirements for monitoring.</p> <p>As required by Regulation 62, the City Council will publish an Annual CIL Report (for the financial year), which shows:</p> <ul style="list-style-type: none"> • The amount of CIL collected • The amount of CIL that has been spent • Information on how CIL funds have been spent (i.e. which infrastructure projects, and how much has been used to cover administrative costs) • The amount of CIL retained at the end of the reporting year.

Respondent	Representation number	Summary of Response	Cambridge City Council Response
Savills on behalf of Marshall Group of Companies	25259	<p>CCC CIL documentation should include:</p> <p><u>Guidance on how to calculate the relevant 'chargeable development'/level of CIL.</u></p> <p><u>Guidance on liability to pay CIL/Appeals process.</u></p> <p>Approach to <u>payments in kind</u> - notably valuation process for land value and also the potential to accept land for infrastructure as a payment in kind.</p> <p><u>Exceptional Circumstances:</u> Guidance on relief from CIL and a policy on exceptional circumstances for relief.</p> <p><u>Review & Monitoring:</u> The authority should have a clearly defined review mechanism. Monitoring data and reviews should be regularly published, for example on the Councils' website. Regular monitoring is key, to ensure that CIL does not stifle development in</p>	<p><u>Payments in kind:</u> Details of any payments in kind policy will be published on the city council website before the CIL charging schedule is implemented.</p> <p><u>Exceptional Circumstances:</u> The Council will publish guidance for relief on CIL on its website once the CIL charging schedule is adopted. The Council does not intend to introduce an exceptional circumstances policy but will keep this position under review as CIL beds in.</p> <p><u>Review & Monitoring:</u> The CIL Regulations (Regulation 62) include detailed requirements for monitoring.</p> <p>As required by Regulation 62, the City Council will publish an Annual CIL Report (for the financial year), which shows:</p> <ul style="list-style-type: none"> • The amount of CIL collected • The amount of CIL that has been spent • Information on how CIL funds have been spent (i.e. which infrastructure projects, and how much has been used to cover administrative

Respondent	Representation number	Summary of Response	Cambridge City Council Response
		<p>the right locations here needs to be monitoring of CIL.</p> <p><u>Infrastructure Delivery and S.106:</u> Further work is also required to relate the list of infrastructure projects, their potential funding and the delivery of the levels of growth proposed. The IDS is an aspirational document with a list of projects rather than a route map for delivery of essential infrastructure.</p> <p>Information on the amounts raised in recent years through S.106 agreements and the extent to which affordable housing and other targets have been met should be produced in advance of the Draft Charging Schedule consultation</p> <p>The charging schedule should be clear that 'double counting' of Section 106 contributions and CIL is not permitted by law.</p>	<p>costs)</p> <ul style="list-style-type: none"> • The amount of CIL retained at the end of the reporting year. <p><u>Infrastructure Delivery and S.106:</u> An update to this study has been carried out since the Preliminary Draft Charging Schedule consultation. This identified a 'CIL Liable' list of infrastructure and funding gap.</p> <p>The Council intends to publish and consult on a Draft Planning Obligations SPD prior to the examination of the Draft Charging Schedule. Further details of how S.106 will work alongside CIL is provided as an appendix to the Draft Charging Schedule Consultation document, this will form the basis for the planning obligations SPD.</p>
Savills on behalf of Taylor Wimpey	25263	Object:	<u>Reg 123 List:</u> Noted. The Council will consult on a draft R.123 list alongside the Draft CIL Charging

Respondent	Representation number	Summary of Response	Cambridge City Council Response
East Anglia and Barratt Homes Eastern Counties		<p><u>Reg 123 List:</u> The R.123 list should be published at Draft Charging Schedule Consultation stage.</p> <p><u>Infrastructure Delivery and S.106:</u> Further work is also required to relate the list of infrastructure projects, their potential funding and the delivery of the levels of growth proposed. The IDS is an aspirational document with a list of projects rather than a route map for delivery of essential infrastructure.</p> <p>The relationship between S.106 and the CIL should be clear to avoid double counting.</p> <p><u>Payments in kind:</u> We are pleased to see that CCC has agreed to use a payment in kind mechanism</p> <p><u>Review & Monitoring:</u> The authority should have a clearly defined review mechanism. Monitoring data and reviews should be regularly published, for example on the Councils' website. Regular monitoring is key, to</p>	<p>Schedule.</p> <p><u>Infrastructure Delivery and S.106:</u> An update to this study has been carried out since the Preliminary Draft Charging Schedule consultation. This identified a 'CIL Liable' list of infrastructure and funding gap.</p> <p>The Council intends to publish and consult on a Draft Planning Obligations SPD prior to the examination of the Draft Charging Schedule. Further details of how S.106 will work alongside CIL is provided as an appendix to the Draft Charging Schedule Consultation document, this will form the basis for the planning obligations SPD.</p> <p><u>Review & Monitoring:</u> The CIL Regulations (Regulation 62) include detailed requirements for monitoring.</p> <p>As required by Regulation 62, the City Council will publish an Annual CIL Report (for the financial year), which shows:</p> <ul style="list-style-type: none"> • The amount of CIL collected • The amount of CIL that has been spent

Respondent	Representation number	Summary of Response	Cambridge City Council Response
		<p>ensure that CIL does not stifle development in the right locations.here needs to be monitoring of CIL.</p>	<ul style="list-style-type: none"> • Information on how CIL funds have been spent (i.e. which infrastructure projects, and how much has been used to cover administrative costs) • The amount of CIL retained at the end of the reporting year.
Anglian Water	29215	<p><u>Wastewater Infrastructure:</u> I would expect there be provision within CIL for wastewater infrastructure. Network improvements (on-site and off-site) are generally funded/part funded through developer contribution via the relevant sections of the Water Industry Act 1991. The costs are determined when we are approached by a developer and an appraisal is carried out. There are a number of payment options available to developers. Options include deducting the revenue that will be raised from the newly connected dwellings (through the household wastewater charges) over a period of twelve years off the capital cost of the network upgrades. The developer</p>	<p>Noted. The Council will consult on a draft R.123 list alongside the Draft CIL Charging Schedule.</p>

Respondent	Representation number	Summary of Response	Cambridge City Council Response
		then pays the outstanding sum.	
Boyer Planning	25236	<p><u>Double Counting:</u> The key point that we would raise at this preliminary consultation stage, aside from the importance of progressing both the SPD and Reg 123 List, is to ensure that there has been no double-counting in respect of items that would potentially fall to be either delivered through specific sites or funded through Section 106 Agreements associated with these.</p>	<p><u>Double Counting:</u> The Council intends to publish and consult on a Draft Planning Obligations SPD prior to the examination of the Draft Charging Schedule. Further details of how S.106 will work alongside CIL is provided as an appendix to the Draft Charging Schedule Consultation document, this will form the basis for the planning obligations SPD.</p> <p>The Council will consult on a draft R.123 list alongside the Draft CIL Charging Schedule.</p>
Cambridgeshire County Council	25214	<p><u>Infrastructure Delivery:</u> CCC want to input on updates to infrastructure requirements. Have concerns over shortfalls for infrastructure, and it will be important that the most critical and essential infrastructure receives funding to support sustainable growth. We want to work with local authorities on prioritisation of infrastructure and agreement on what will be funded and when.</p>	<p><u>Infrastructure Delivery:</u> Noted. CCC have been consulted on all aspects of the Infrastructure Delivery Study. The Council will continue to work alongside CCC with regard to the prioritisation of infrastructure.</p> <p><u>Administration Charge:</u> Detailed mechanisms for the administration and implementation of CIL is an area of work that is on-going, but will be clarified before the Council introduces the CIL (likely to be</p>

Respondent	Representation number	Summary of Response	Cambridge City Council Response
		<p><u>Administration Charge:</u> CCC are unclear if they will receive any of the 5% CIL administration charge charging authorities are entitled to apply.</p> <p><u>Meaningful Proportion:</u> CCC want to work with the Council on the meaningful proportion and align with strategic aims. Thought needs to be given to the role of city deal</p>	<p>April 1st 2015).</p> <p><u>Meaningful Proportion:</u> Noted. The City Council is currently working with CCC in relation to CIL Governance arrangements. Governance of CIL, including how neighbourhood funds will be dealt with, will be clarified before the Council introduces the CIL (likely to be April 1st 2015).</p>
English Heritage	25248	<p><u>Historic Environment:</u> It will be important to ensure that the historic environment is carefully considered as a topic, and we welcome the proposed clarification in a future document of which regimes will be applied. There will be some cases where heritage may well be defined as infrastructure, and contributions to public realm improvements, certain historic structures and historic open spaces may be areas that can benefit from CIL.</p>	Noted

Respondent	Representation number	Summary of Response	Cambridge City Council Response
		We would be pleased to discuss this further with you.	
Fitzwilliam College	25207	<p><u>Discretionary Charitable Relief:</u> Comment refers specifically to section 5.5 of the Document "Discretionary Charitable Relief" and the intention expressed by the Council not to offer this type of relief at the present time. The College does not agree with the Council's assertion that it does not propose to introduce a discretionary relief policy for CIL. It is considered crucial that the Cambridge City Council introduce such a policy. We do not believe the management and administrative complexity is a sufficient barrier to prevent a discretionary policy mechanism.</p>	<p><u>Discretionary Charitable Relief:</u> The Council is not obliged or does not intend to introduce a discretionary charitable relief policy at this stage. This is something the Council will keep under review as the CIL system beds in.</p>
Histon and Impington Parish Council	25229	<p>Object:</p> <p><u>CIL Receipts:</u> The documentation should clearly identify:</p> <p>a. the expected return from the introduction of CIL</p>	<p><u>CIL Receipts:</u> The Draft Charging Schedule consultation documents contain an assessment of potential CIL revenue (paras 4.3.18 – 4.3.25) and an assessment of S.106 agreed in recent years (Appendix A)</p> <p><u>Reg 123 List:</u> The Council will consult on a draft</p>

Respondent	Representation number	Summary of Response	Cambridge City Council Response
		<p>b. the expected change in return from the switch to CIL from S106 payments</p> <p><u>Reg 123 List:</u> The documentation should identify specific projects for which funding is being sought.</p> <p><u>Monitoring and Review:</u> It is essential that an effective monitoring and review process is in place</p>	<p>R.123 list alongside the Draft CIL Charging Schedule.</p> <p><u>Monitoring and Review:</u> The CIL Regulations (Regulation 62) include detailed requirements for monitoring.</p> <p>As required by Regulation 62, the City Council will publish an Annual CIL Report (for the financial year), which shows:</p> <ul style="list-style-type: none"> • The amount of CIL collected • The amount of CIL that has been spent • Information on how CIL funds have been spent (i.e. which infrastructure projects, and how much has been used to cover administrative costs) • The amount of CIL retained at the end of the reporting year.
Magdalene College	25233	<p><u>Discretionary Charitable Relief:</u> The College meets the criteria shown for mandatory relief from CIL being a registered charity. Whilst the City Council would need to provide a</p>	<p><u>Discretionary Charitable Relief:</u> The Council is not obliged or does not intend to introduce a discretionary charitable relief policy at this stage. This is something the Council will keep under</p>

Respondent	Representation number	Summary of Response	Cambridge City Council Response
		<p>discerning view of schemes, it seems short-sighted not to allow provision for discretionary relief to allow appropriate development for mixed and sophisticated schemes if they would be in the wider economic interests of the city.</p> <p>As a new policy any initial assumptions relating to development should be regularly against actual experience and the timing of any CIL payments should realistically reflect the cash flow profile of typical development schemes.</p>	<p>review as the CIL system beds in.</p>
Natural England	25245	<p><u>Green Infrastructure</u>: Advise the Council gives careful consideration to the role CIL has in the creation, protection, enhancement and management of networks of biodiversity and green infrastructure and list the type of infrastructure that might include</p>	<p>Noted.</p>
South Cambridgeshire District Council	25244	<p>SCDC suggests that reference to the infrastructure requirements for South Cambridgeshire is removed from Table 1 to provide a more transparent case that Cambridge City is introducing CIL to fund its</p>	<p>Noted. The infrastructure requirements of both authorities are inextricably linked.</p>

Respondent	Representation number	Summary of Response	Cambridge City Council Response
		own infrastructure needs.	
Sport England	25238	<u>Infrastructure Delivery Study</u> : We support the principle of swimming pools, sports halls and sports pitches being included within the definition of 'Leisure and Recreation' facilities to be funded through CIL. We support the principle of a joint Infrastructure Delivery Plan with SCDC, as there is a great deal of inter-dependency between the two authorities with regard to sports provision. We support the IDP being a 'living' document that will be reviewed and revised at regular intervals. Similarly, the Sports Facilities Calculator and Sports Facilities Costings are also reviewed at regular intervals and there will be a need to update CIL documents accordingly.	Noted
Terrence O'Rourke on behalf of Universities Superannuation Scheme	25239	<u>Exceptional Circumstances Relief</u> : The Council should adopt an exemptions policy. This would provide a mechanism for assisting with delivery in the event that key brownfield regeneration sites are faced with abnormal	<u>Exceptional Circumstances</u> : The Council will publish guidance for relief on CIL on its website once the CIL charging schedule is adopted. The Council does not intend to introduce an exceptional circumstances policy but will keep this position

Respondent	Representation number	Summary of Response	Cambridge City Council Response
		<p>and unforeseen costs. In the absence of such a policy, these sites may be stymied, to the detriment of the city's economy and vibrancy. This is a useful tool in finding site specific solutions, given the uniqueness of each particular site, and the generic nature of viability assessments. Such a policy will provide flexibility to the Council, and the ability to treat proposals on a site by site basis.</p>	<p>under review as CIL beds in.</p>
<p>University of Cambridge</p>	<p>25266</p>	<p><u>Charitable Relief</u>: The University supports the representations submitted by Savills on behalf of the Cambridge Colleges' Bursars' Environment and Planning Sub Committee (BEPSC), particularly in relation to charitable relief from chargeable developments through mandatory relief and through positive provision for discretionary relief.</p>	<p>Noted. The Council will publish guidance for relief on CIL on its website once the CIL charging schedule is adopted. The Council does not intend to introduce an exceptional circumstances policy but will keep this position under review as CIL beds in.</p>
<p>Dr Edward Lloyd Jenkins</p>	<p>24866</p>	<p>Object.</p> <p>More emphasis on the possible beneficial intro of recreational facilities suitable for all ages and backgrounds. The community, particularly</p>	<p>Noted.</p>

Respondent	Representation number	Summary of Response	Cambridge City Council Response
		in areas such as Mill Road, needs to develop in an agreeable and inclusive way, and this levy should be used evidently for this purpose in certain areas.	

APPENDIX 2 – LIST OF CONSULTEES

Below is a list of organisations that were directly informed of the CIL Preliminary Draft Charging Schedule consultation via email (individuals are not listed). In addition to this list, the public will be informed through a press release and through the Council's webpages.

SPECIFIC CONSULTATION BODIES

- Anglian Water
- Barton Parish Council
- British Gas
- Cambridge Crown Court
- Cambridge University Hospital (Addenbrooke's)
- Cambridge Water Company
- Cambridgeshire Constabulary
- Cambridgeshire County Council
- Cambridgeshire Primary Care Trust
- Comberton Parish Council
- Coton Parish Council
- Cottenham Parish Council
- E.On Energy
- East Cambridgeshire District Council
- EDF Energy
- English Heritage
- Environment Agency
- Fen Ditton Parish Council
- Fenland District Council
- Fulbourn Parish Council
- Girton Parish Council
- Grantchester Parish Council
- Great Shelford Parish Council
- Hauxton Parish Council
- Highways Agency
- Histon and Impington Parish Councils
- Homes and Communities Agency
- Horningsea Parish Council
- Huntingdonshire District Council
- Madingley Parish Council
- Milton Parish Council
- N Power
- National Grid Transco
- Natural England
- Network Rail

- Norfolk Suffolk and Cambridgeshire Strategic Health Authority
- Npower Renewables
- Orchard Park Community Council
- Peterborough City Council
- Scottish and Southern Electric
- Scottish Power
- South Cambridgeshire District Council
- Teversham Parish Council

COUNCILLORS AND MPS

- 42 x City Councillors
- All County Councillors (City Wards)
- Julian Huppert MP
- Andrew Lansley MP

COMMUNITY ORGANISATIONS

- Age Concern Cambridgeshire
- Arthur Rank Hospice Charity
- Cambridge Citizens Advise Bureau
- Cambridge Ethnic Community Forum
- Cambridge Federation of Residents' Associations
- Cambridge Interfaith Group
- Cambridgeshire Older Peoples Enterprise (COPE)
- Cambridgeshire Voluntary Sector Infrastructure Consortium (CVSIC)
- Disability Cambridgeshire
- East of England Faiths Council
- Encompass Network
- Irish Traveller Movement in Britain
- National Federation of Gypsy Liaison Groups
- The Church of England Ely Diocese
- The COVER Group

- The East Anglian Gypsy Council
- The GET Group
- Traveller Solidarity Network
- Work Advice Volunteering Education Training (WAVET)

ENVIRONMENTAL

- Cam Valley Forum
- Cambridge Carbon Footprint
- Cambridge Friends of the Earth
- Cambridge Past, Present and Future
- Cambridgeshire Local Access Forum
- Campaign to Protect Rural England
- Conservators of the River Cam
- Countryside Restoration Trust
- Hobson's Conduit Trust
- National Trust
- RSPB Eastern England Office
- The Wildlife Trust
- Transition Cambridge

DEVELOPERS/AGENTS

- Artek Design House
- Barratt Eastern Counties
- Barton Wilmore
- Beacon Planning Ltd
- Bellway Homes
- Berkeley Homes
- Bidwells
- Bovis Homes Ltd
- Brookgate
- Capita Symonds
- Carter Jonas
- Chartered Institute of Architectural Technologist
- Cheffins
- Countryside Properties
- DPP
- Drivers Jonas
- Estate Management and Building Service, University of Cambridge
- Gallagher Estates

- Grosvenor USS
- Home Builders Federation
- Icen Projects Ltd
- Januarys
- Liberty Property Trust
- RPS
- Savills
- Skanska UK Plc
- Taylor Vinters
- Taylor Woodrow Developments Ltd
- Terrance O'Rourke
- The Home Builders Federation
- The Howard Group of Companies
- The Universities Superannuation Scheme
- Unex
- Liddl

BUSINESSES

- ARM Holdings
- Cambridge Cleantech
- Cambridge Energy Forum
- Cambridge Hoteliers Association
- Cambridge Network
- Cambridgeshire Chambers of Commerce
- CRACA
- Creative Front
- Ely Cathedral Business Group
- Encompass Network
- Federation of Small Businesses
- Future Business
- Greater Cambridge Greater Peterborough Local Enterprise Partnership
- Love Cambridge
- Marshalls Group of Companies
- One Nucleus
- Redgate Software
- Royal Mail Group Ltd
- St John's Innovation Centre

EDUCATION

- Anglia Ruskin University
- University of Cambridge
- All Colleges of the University of Cambridge
- The Bursars' Committee
- Sixth Form Colleges
- Private Schools
- Cambridge Regional College
- Language Schools
- Secondary Schools in Cambridge

RESIDENTS ASSOCIATIONS

- All residents associations in Cambridge
- FECRA (Federation of Cambridge Residents Associations)

OTHERS

- Argyle Street Housing Cooperative
- BT Open Reach Newsites
- Cable and Wireless UK
- Cambridge Association of Architects
- Cambridge Cycling Campaign
- Cambridge Federation of Tenants and Leaseholders
- Cambridge Local Access Forum
- Cambridgeshire Campaign for Better Transport
- Cambridgeshire Fire and Rescue Service
- Design Council/CABE
- Fenner's Lawn Residents Association Ltd
- Friends of Milton Road Library
- Local Strategic Partnership
- Mobile Operators Association
- Registered Social Landlords
- Shape East
- Sport England
- The Linchpin Project

APPENDIX 3 – NEWSPAPER NOTICE

The following appeared in the Cambridge Evening News on 18 March 2013:

Notice of publication of the Cambridge Community Infrastructure Levy Preliminary Draft Charging Schedule (March 2013) for public consultation

Cambridge City Council is in the process of preparing a Community Infrastructure Levy (CIL) Charging Schedule. CIL is a new charge that local authorities can levy on all new development in their area to fund infrastructure improvements related to new development. The levy will be used to fund infrastructure to support growth.

A CIL Preliminary Draft Charging Schedule has been developed which sets out the proposed charging rates for Cambridge. The Council considers that the preliminary Draft Charging Schedule strikes an appropriate balance between contributing to funding infrastructure and not putting development across Cambridge at risk.

In accordance with Regulation 15 of the CIL Regulations (as amended), comments are invited on the Preliminary Draft Charging Schedule, and its associated evidence base documents, during the consultation period **starting 18 March 2013 and ending 29 April 2013 at 5PM.**

The Preliminary Draft Charging Schedule and other relevant supporting documents are available for inspection:

- Online on the City Council's website:
<https://www.cambridge.gov.uk/community-infrastructure-levy>
- At Cambridge City Council's Customer Service Centre at Mandela House, 4 Regent Street, Cambridge, CB2 1BY from 8am-6pm on Mondays, Tuesdays, Wednesdays and Fridays, and 9am-6pm on Thursdays.

Comments should be made using:

- The online response system available on the City Council website
<http://cambridge.jdi-consult.net/ldf/>;
- Printed response forms are available from the Customer Service Centre (as above) or can be downloaded and filled in electronically by visiting
<https://www.cambridge.gov.uk/community-infrastructure-levy>

Completed response forms should be sent to:

- CIL Preliminary Draft Charging Schedule Consultation, Planning Policy Team, Cambridge City Council, PO Box 700, Cambridge, CB1 0JH
- Or emailed to policysurveys@cambridge.gov.uk

Representations received on the preliminary draft charging schedule will be taken into consideration in preparing the draft charging schedule. Following an additional period of consultation on the second draft, the charging schedule will be examined in public by an independent inspector.

For further information, please contact the Planning Policy team at 01223 457000 or e-mail using the address above

APPENDIX 4 – CONSULTATION LETTER/EMAIL

Brendan Troy
Senior Planning Officer
Email: policysurveys@cambridge.gov.uk
Tel: 01223 457000
Fax: 01223 457369



14th March 2013

Dear Consultee,

Community Infrastructure Levy Preliminary Draft Charging Schedule – notice of consultation

Cambridge City Council is in the process of preparing a Community Infrastructure Levy (CIL) Charging Schedule. CIL is a new charge that local authorities can levy on all new development in their area to fund infrastructure improvements related to new development. The levy will be used to fund infrastructure to support growth.

A preliminary Draft Charging Schedule has been developed which sets out the proposed charging rates for Cambridge. The Council considers that the preliminary Draft Charging Schedule strikes an appropriate balance between contributing to funding infrastructure and not putting development across Cambridge at risk.

In accordance with Regulation 15 of the CIL Regulations (as amended), comments are invited on the Preliminary Draft Charging Schedule, and its associated evidence base documents, during the consultation period starting **18 March 2013 and ending 29 April 2013 at 5PM.**

A copy of the Preliminary Draft Charging Schedule and supporting documents can be found at the following address - <https://www.cambridge.gov.uk/community-infrastructure-levy> .

Please send us any representations using our online consultation system <http://cambridge.jdi-consult.net/ldf/>. This is the Council's preferred method for receiving representations, but if you prefer to fill in a response form please return electronically wherever possible. If you do not have access to a computer, a paper form can be completed and sent to the Council. The response form can be downloaded from the Council's website or obtained by contacting the Council.

If you have any queries please do not hesitate to contact the planning policy team.

Yours sincerely

Brendan Troy
Senior Planning Officer

Patsy Dell, Head of Planning, Cambridge City Council, PO Box 700, CB1 0JH

