

Rhondda Cynon Taf Council

# **COMMUNITY INFRASTRUCTURE LEVY**

## **DRAFT CHARGING SCHEDULE**

### **Report of Comments and Responses**

**October 2013**



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## 1. Introduction

1.1 On 24<sup>th</sup> June 2013 Rhondda Cynon Taf County Borough Council issued for public consultation the Community Infrastructure Levy (CIL) Draft Charging Schedule.

The Draft Charging Schedule was approved a meeting of Cabinet on 20<sup>th</sup> May 2013. The Schedule was published for public consultation for six weeks from 27<sup>th</sup> June 2013 to 7<sup>th</sup> August 2013.

The purpose of this statement is to provide a record of the consultation undertaken and a summary of the representations received to the Draft Charging Schedule. Section 2 of this statement includes information on the consultation and publicity undertaken during the consultation period and a list of those individuals and organisations consulted. Section 3 sets out the number of representations received to the Draft Charging Schedule, a summary of the main issues raised by respondents and the Council's response.

This document has been prepared in accordance with the requirements of the Community Infrastructure Levy Regulations 2010 (as amended).

## 2. Record of Consultation

2.1 The public consultation carried out on the Draft Charging Schedule was undertaken in accordance with the requirements of Regulation 16 of the Community Infrastructure Levy Regulations 2010 (as amended).

### ***Consultation***

2.2 The package of documents published on the 27<sup>th</sup> June 2013 comprised:

- Community Infrastructure Structure Draft Charging Schedule (June 2013)
- Rhondda Cynon Taf LDP Infrastructure Assessment Background Paper (March 2013)
- Study into the Economic Viability of Charging Community Infrastructure Levy in Caerphilly, Merthyr Tydfil and Rhondda Cynon Taf County Borough Councils (District Valuer Services, 2012)
- CIL Representation Form
- Consultation Letter (Appendix 1)
- CIL Advisory Leaflet (Appendix 2)
- CIL Zone Maps
- Legal Notice (Regulation 16)
- Statement of Representations Procedure (June 2013)
- Rhondda Cynon Taf Draft Infrastructure List (May 2013)

- Rhondda Cynon Taf Community Infrastructure Levy Preliminary Draft Charging Schedule – Report of Comments and Responses (January 2013)

Copies of the above documents were sent to the Consultation Bodies listed in Appendix 3.

2.3 Notification letters were sent to approximately 737 different contacts on the Council's CIL database. This included Local and Government Consultation Bodies, Private Sector Organisations, Community Groups and Landowners. The consultation list is contained in Appendix 4. Notification was also sent to Members and staff of Rhondda Cynon Taf County Borough Council.

### ***Publicity and Participation***

2.4 The Package of Draft Charging Schedule documents was published on the Council's website on 27<sup>th</sup> June 2013. This contained advice on the availability of information, the consultation process and where additional advice and assistance could be obtained. Copies of the web pages are attached as Appendix 5.

2.5 Public notices were placed in the Western Mail on 4<sup>th</sup> July 2013 and the Rhondda Leader, Pontypridd Observer and Cynon Valley Leader on 27<sup>th</sup> June 2013. A copy of the public notices is contained in Appendix 6.

2.6 A Developer Panel was held on 17<sup>th</sup> July 2013 to consider and debate the Preliminary Draft Charging Schedule.

### ***Availability***

2.7 Copies of the Draft Charging Schedule and associated documents were placed for inspection at the Council Officers in Sardis House, Sardis Road, Pontypridd. In addition copies were made available at the Council Office, Clydach Vale; The One for All Centres: Rock Grounds Aberdare, Bronwydd House Porth, Treorchy Library and Mountain Ash Library and all the Libraries serving the County Borough.

2.8 The Draft Consultation documents were placed on the Council's Website for inspection/downloading and were available throughout the consultation process. The Website contained full details of the consultation links to related CIL and related Local Development Plan documents and advice on how to make representations. An online representations form allowed representations to be submitted electronically.

### 3 Summary of Representations

3.1 A total of 20 representations and 1 late representation were received in respect of the Draft Charging Schedule. A list of the representors is attached as Appendix 8.

3.2 A number of important issues were raised through the representations to the consultation process. These include:

- the detrimental Impact on the introduction CIL will have on the economy of RCT;
- Zone 1 should be extended to Rhydfelin and the remainder of the County Borough should be classed as Zone 2. Zone 3 should be scrapped;
- need for discretionary relief from CIL;
- the use of CIL for utility infrastructure;
- the impact of CIL on strategic sites;
- the impact of CIL on the delivery of affordable housing;
- the need to avoid double counting between S106 requirements and CIL;
- the impact of CIL in the development of retirement housing;
- the robustness of the Economic Viability Appraisal; and
- the appropriateness of including Tonyrefail in Zone 3.

3.3 A schedule of the issues raised by respondents and the Council's response is attached as Appendix 9

### 4. Further Advice

4.1 If you require any further advice or assistance in respect this or other CIL documents or wish to be placed on the Council's consultation database please contact a member of the Spatial Development Team at:

Regeneration and Planning  
Floor 3  
Sardis House  
Sardis Road  
Pontypridd  
CF37 1DU  
Email: [LDP@rhondda-cynon-taf.gov.uk](mailto:LDP@rhondda-cynon-taf.gov.uk)

Telephone: 01443 494735

**Appendix 1: Letters of consultation**

Our Ref/Ein Cyf:

Your Ref/Eich Cyf:

Date/Dyddiad: 24<sup>th</sup> June 2013

Dear Sir or Madam

**RHONDDA CYNON TAF COMMUNITY INFRASTRUCTURE LEVY (CIL) DRAFT CHARGING SCHEDULE AND SUPPLEMENTARY PLANNING GUIDANCE CONSULTATION**

I am writing to advise you that Rhondda Cynon Taf County Borough Council is in the process of preparing a Community Infrastructure Levy (CIL) charging schedule. CIL is a new charge that Council's in England and Wales can place on new development within their area. The money generated via the levy will contribute towards the funding of infrastructure to support growth.

In addition to the consultation on CIL, the Council is also seeking views on the following Supplementary Planning Guidance (SPG):

- Planning Obligations (Revised May 2013)
- Shop-front Design (May 2013)

The draft CIL charging schedule and SPGs will be available for public consultation between 27<sup>th</sup> June 2013 – 7<sup>th</sup> August 2013.

The Council would welcome your views on the draft charging schedule and SPG. The schedule, SPG, associated documents and representation forms are available for inspection at:

**Sardis House, Sardis Road, Pontypridd, CF37 1DU** and can also be viewed at local libraries, main Council Offices, One 4 All Centres and online at [www.rhondda-cynon-taff.gov.uk](http://www.rhondda-cynon-taff.gov.uk).

Should you wish to make any comments, please do so by no later than 5:00pm on the 7<sup>th</sup> August 2013 via one of the following means:

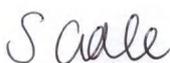
- Online at [www.rhondda-cynon-taff.gov.uk](http://www.rhondda-cynon-taff.gov.uk)
- Email: [LDP@rctcbc.gov.uk](mailto:LDP@rctcbc.gov.uk)
- Post: Spatial Development Team, Floor 3, Sardis House, Sardis Road, Pontypridd, CF37 1DU.

Copies of the draft charging schedule and SPG in English and Welsh can be made available upon request. Further updates in respect of the preparation of these documents will be posted on the website in due course.

Representations received on the draft charging schedule will be considered in the preparation of the final charging schedule. This second period of consultation will then be followed by a CIL examination in public conducted by an independent examiner.

Should you have any queries regarding the aforementioned, please do not hesitate to contact the Spatial Development Team on 01443 494735 or via email at: [LDP@rctcbc.gov.uk](mailto:LDP@rctcbc.gov.uk)

Yours sincerely



Simon Gale  
**Service Director of Planning**

## Appendix 2: CIL Advisory Leaflet

June 2013



rhondda cynon taf  
community infrastructure levy  
*ardoll seilwaith cymunedol*

# Community Infrastructure Levy

What are your views?



### What is the Community Infrastructure Levy (CIL)?

The Community Infrastructure Levy is a new levy that local authorities in England and Wales can choose to charge on new developments in their area.

The money will be used to support development by funding infrastructure such as the provision of new roads, public transport, schools and public open space.

The system is very simple. It applies to most new buildings with 100 sq m or more of gross internal floorspace or involves the creation of at least one dwelling. Charges are based on the size and type of new development.

Rhondda Cynon Taf Council wants to move forward to use this system locally. To do this, the Council has undertaken a lot of the work needed to set the local rate.

This leaflet tells you more about the CIL and how the Council intends to apply it.

### What are the benefits?

#### The Community Infrastructure Levy will:

- Deliver funding for the Council to carry out a range of infrastructure projects that support growth and benefit the local community;
- Provide developers with much more certainty 'up front' about how much money they will be expected to contribute, which in turn encourages greater confidence and higher levels of inward investment, and
- Ensure greater transparency for local people because they will be able to understand how new development is contributing to their community, through the CIL annual report.

### How to make a representation

Email: [ldp@rctcbc.gov.uk](mailto:ldp@rctcbc.gov.uk)

#### Write to:

The Spatial Development Team, Regeneration & Planning Division, Rhondda Cynon Taf County Borough Council, Floor 3, Sardis House, Sardis Road, Pontypridd, CF37 1DU

#### Representation Form:

A representation form and the Draft Charging Schedule can be downloaded from the Council's website. Please ensure your comments reach us by the 7th August 2013

#### Queries:

If you have any queries please phone the Spatial Development Team on 01443 494735

### Where to view the Draft Charging Schedule

Copies of the documents and details of how to make representations can be viewed:

- On the Council's website at: [www.rctcbc.gov.uk](http://www.rctcbc.gov.uk)
- At local libraries, main Council offices and One 4 All Centres



STRONG HERITAGE | STRONG FUTURE  
**RHONDDA CYNON TAF**  
TRIFFADAETH GADARN | DYFODOL SICR

### How will the levy work?

CIL will be used as the mechanism for pooling contributions from a variety of new developments to fund the provision of new infrastructure to support those developments in the wider area.

Planning obligations (Section 106 agreements between the local planning authority and the developer) will continue to play an

important role in dealing with site-specific issues and in helping to make individual developments acceptable to local planning authorities and communities.

It will not be possible to charge twice for the same infrastructure works through both Section 106 and CIL.

### What will CIL money be spent on?

The CIL will be spent on infrastructure needed to support development within the County Borough. The Council identified a number of projects and infrastructure in its Local Development Plan, which are required to support new growth.

The regulations recognise that priorities change and allow for new projects to be identified that weren't originally foreseen. The Council has published a list of the infrastructure it intends to fund through CIL on its website.

### What is the proposed CIL level?

Most development that involves an increase in floorspace will come under the scope of CIL.

- The Council has worked with the district valuer to ensure that CIL will not make new developments in Rhondda Cynon Taf unviable.
- The levy will not be charged if there is no increase in the floorspace of the building as a result of the development.
- The charge does not apply to change of use applications.
- The charge must be levied in pounds sterling (£) per sq m. It will be collected, in most cases, as a cash contribution.
- Charitable organisations and the provision of affordable housing are exempt from paying the levy.

Having identified the infrastructure needs of the County Borough and considered the implications on development viability of potential levy rates, the Council is proposing to charge the following level of CIL per sq m of new development.



Residential Rates	
Zone	CIL Rate per sq m
1	£0
2	£40
3	£100



Commercial Rates	
Development	CIL Rate per sq m
Retail (A1)	£100
Retail (A3)	£25
Primary Healthcare (D1)	£60

Please note that CIL charge will not apply to that part of Rhondda Cynon Taf that lies within the Brecon Beacons National Park.

### How will CIL work?

If you want to build a new house in Zone 3, CIL will be payable at £100 per sq m. A house with a floorspace of 80 sq m will pay a CIL charge of £8,000. In Zone 2 the charge is £40 per sq m and there is no charge in Zone 1.

If you want to build a new shop, the CIL charge will be payable at £100 per sq m. A shop with a floorspace of 100 sq m will pay £10,000. If you want to open a shop in an existing unit, CIL does not apply and there is no CIL charge. No charge will be levied against new business or industrial development.

### When will CIL come into force?

The timetable for adoption is:



www.rctcbc.gov.uk

**Appendix 3: List of consultation Bodies**

<i>Representor No.</i>	<i>Name</i>	<i>Organisation</i>
692	Mr. Peter Morris	Powys County Council
2146	Mrs Rosemary Thomas	Welsh Assembly Government
6312	Mrs Pauline Williams	Ynysybwl and Coed Y Cwm Community Council
6313	Mrs Susan Harvey Powell	Rhigos Community Council
6314	Mr Mike Burke	Hirwaun and Penderyn Community Council
6315	Mr Gethin Williams	Pontypridd Town Council
6316	Leanne Handley	Llantwit Fardre Community Council
6317	Mrs A Jenkins	Llantrisant Community Council
6318	Mr Peter Davies	Llanharan Community Council
6319	Mrs Gillian Lewis	Llanharry Community Council
6320	Ms Pauline Williams	Tonyrefail Community Council
6321	Mrs E Jones	Gilfach Goch Community Council
6322	Mr J.H.G Lewis	Pontyclun Community Council
6323	Mr Derek Allinson	Taffs Well Community Council
6325	Mr. Phil Williams	Cardiff County Council
6326	Mr Rob Thomas	Vale of Glamorgan County Council
6327	Mr Dave Llewellyn	Bridgend County Borough Council
6328	Mr Geoff White	Neath and Port Talbot County Council
6329	Mr Christopher Morgan	Brecon Beacons National Park Authority
6330	Mr Roger Tanner	Caerphilly County Borough Council
6331	Mrs Judith Jones	Merthyr Tydfil County Borough Council
6332	Mr Duncan Smith	Torfaen County Borough Council
6333	Mr George Ashworth	Monmouthshire County Council
6334	Ms Sheila Davies	Newport City Council
6335	Mr Gareth Jones	Blaenau Gwent County Borough Council
6336		Department for Communities and Local Government
6337	Mr Rhydian Clement	Welsh Water
		Natural Resources Wales

## Appendix 4: Consultation List

Rep No.	Name	Organisation
6341	Mr Paul Williams	Savills
6342	Mr Keith Warren	Asbri Planning
6343	Ms Berardine Rees	Cwm Taf Health Board
6344	Ms Davina Powell	Nathaniel Lichfield & Partners
6345	Mr Tony Evans	Best Wishes Card Shop
6346		Durbin Properties
6347	Ms Claire Baker	Flower Shop
6348	Mr Howell Day	Howells Menswear
6349	Mr Dave O'Mahoney	Mountain Ash RFC
6350	Mr Meirion Collins	South Wales Police HQ
6351	Ms Patricia Bowen	Accessible Caring Transport
6352	Mr Lirato	M & S Estate Agent
6353	Eluned Parrott	Welsh Government
6312	Mrs Pauline Williams	Ynysybwl & Coed-y-Cwm Community Council
6313	Mrs Susan Harvey-Powell	Rhigos Community Council
6314	Mr Mike Burke	Hirwaun & Penderyn Community Council
6315	Mr Gethin Williams	Pontypridd Town Council
6316	Ms Leanne Handley	Llantwit Fardre Community Council
6317	Mrs A. Jenkins	Llantrisant Community Council
6318	Mr Peter Davies	Llanharan Community Council
6319	Mrs Gillian Lewis	Llanharry Community Council
6320	Ms Pauline Williams	Tonyrefail Community Council
6321	Mrs E. Jones	Gilfach Goch Community Council
6322	Mr J. H. G. Lewis	Pontyclun Community Council
6323	Mr Derek Allinson	Taffs Well Community Council
6325	Mr Phil Williams	Cardiff City Council
6326	Mr Rob Thomas	Vale of Glamorgan Council
6327	Mr Dave Llewellyn	Bridgend County Borough Council
6328	Mr Geoff White	Neath & Port Talbot County Council
6329	Mr Christopher Morgan	Brecon Beacons National Park Authority
6330	Mr Roger Tanner	Caerphilly County Borough Council
6331	Mrs Judith Jones	Merthyr Tydfil County Borough Council

Rep No.	Name	Organisation
6332	Mr Duncan Smith	Torfaen County Borough Council
6333	Mr George Ashworth	Monmouthshire County Council
6334	Ms Sheila Davies	Newport City Council
6335	Mr Gareth Jones	Blaenau Gwent County Borough Council
6336		Department for Communities and Local Government
6337	Mr Rhydian Clement	Welsh Water
6338		Environment Agency Wales
6339	Ms Liz Howe	Environment Agency Wales South East Area Office
6340	Miss Gillian Barter	Countryside Council for Wales
3 (Mobile Operators Association)		Mono Consultants Ltd
4		National Library of Wales
5	Mrs Ann Clwyd	
6	Mr Huw Irranca-Davies	
8	Mr Chris Bryant	
9		Cardiff International Airport
12		Children in Wales
15		The Caravan Club
17		Cable and Wireless
18		Land Access & Recreation Association (LARA)
20		Merthyr & The Valleys - MIND
22	Ms Pauline Young	Viva Project
25		Bus Users UK
27	Mrs Maureen Broadstock	TARCA
28 (Orange Personal Communications)	Ms Carolyn Wilson	Mono Consultants Ltd
30	Mr Neil Maylan	Glamorgan-Gwent Archaeological Trust Ltd
31	Ms Abigail Dodds	British Wind Energy Association
33		Forestry Authority (Wales)
34	Mr Peter Black, AM	Welsh Government
35	Mr Byron Davies, AM	Welsh Government

## Report of Comments and Responses

## Draft Charging Schedule

Rep No.	Name	Organisation
37	Janice Gregory, AM	Welsh Government
40	David Melding, AM	Welsh Government
44		Welsh Liberal Democrats
45		Institute of Directors Wales
46		Freight Transport Association
47	Mrs Wendy Richards	Design Commission for Wales
48		Welsh Historic Gardens Trust
51		Inland Waterways Amenity Advisory Council
52		The Valuation Office Agency
54		RSPB
55 (Road Haulage Association Ltd.)		C/o Asbri Planning
57		Ramblers Cymru
59	Mr David Brewer	Confederation of UK Coal Producers (Coalpro)
61	Paula Maxwell	Business in the Community
66	Leah Coles	Cwlwm Busnes y Cymoedd
68 (Quarry Products Association)		C/o Entec UK Ltd
71		Federation for the Blind
72		Association of Inland Navigation Authorities
73		Wildlife & Wetlands Trust
76		Post Office Holdings
83		Pontypridd & Rhondda Community Health Council
88		British Waterways
89		Coed Cymru
91		Open Spaces Society
96		Royal Commission on the Ancient and Historical Monuments of Wales
100	Mr Rhodri Edwards	Fields In Trust Cymru
101		Cyclists Touring Club
102		Methyr & Cynon Valley Community Health Council
103		Innogy plc
106		Glamorgan Wildlife Trust

Rep No.	Name	Organisation
107	Mr Nigel Ajax Lewis	Wildlife Trust for South & West Wales
114	Mr John Evans	Business in Focus
120		Council for the Protection of Rural Wales
121		Plaid Cymru
122		Disability Wales
125		RWE npower
127		National Telecommunications Ltd
129	Mr Frank Hodder	Nant Y Frwd Tennants & Residents Association
130	Mrs Joy Bishop	Ynysbwl Regeneration Partnership
133		British Retail Consortium
136	Mr Phillip Thomas	P.T. Civil Engineering
137		Farmers Union of Wales
138	Mr Anthony Wallis	Forestry Commission / Forest Enterprise (Wales)
139		Lattice Property (formerly British Gas Property)
140		National Farmers Union
142		Deaf Association Wales
143		Cardiff Bus Company
144	Ms Haf Roberts	WWF Cymru
148		Cardiff Gypsy Sites Group
149		British Telecom
150		The Welsh Conservatives
151		Community Service Volunteers Wales
155		Camping & Caravanning Club
156	AC Helmore	Celtic Energy Ltd
157		Campaign for Real Ale
161		Stagecoach in South Wales
162		British Naturalists Association
164		TraVol Community Transport
165		Capel Hillside Residents Association
166		Countryside Alliance
172		British Association for Shooting and Conservation
173		Federation of Small Businesses
174		Arts Council of Wales
175		Partially Sighted Society

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Rep No.	Name	Organisation
176	D.E. James	Ramblers Association (Cynon Valley Group)
177		Youth Hostel Association
178		Age Concern Cymru
179		Labour Party
181		SWALEC
183		CBI Wales
184		Cardiff Cycling Campaign
186		National Old Age Pensioners Association for Wales
187		RNIB Cymru
188		The Civic Trust for Wales
189	Mr Paul Nagle	Telecentre & Business School Limited
192	Mr Jeff Pride	Herian
193	Captain Richard Waters	Salvation Army
275	Dr Huw Jones	The Sports Council for Wales
278	Miss Kath Davies	Health & Safety Executive
279	Miss Tracey Stone	Llwynypia Communities First Team
288	Mr Dylan Roberts	Welsh Language Board
292	Mr Chris Bouchier	Crown Estate Office
296	Mr Allan Fogg	Defence Estates
306	Miss Rachael Bust	The Coal Authority
309	Mr Leighton Andrews, AM	Welsh Government
316	Mr Keith Jenkins	Cwm Clydach Communities First Team
319	Mr Gary Foreman	Penywaun Enterprise Partnership
320		BT Wholesale, Network Access
332	Mr Stephen Smith	Cymmer Communities First Office
337	Mr Chris Lambart	The National Trust
342	Mr Brian Shilton	Chair, Fernhill & Glenboi Communities First P'ship
344	Mr Gerry Scicluna	Venture Wales
363	Mr Peter Clement	The Group Valuation Office
369	Mr Dafydd Morgan	Wales TUC
379	Mr Alan Maddox	Amgen
384	Mr Mike Carroll	First Great Western
387	Mr Darren Jones	Miskin Communities First
397	Mr Bernard Lewis	Penrhiwceiber Communities First Partnership
412	Mr Andrew Roberts	Perthcelyn Communities First

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Rep No.	Name	Organisation
413	Mr Chris Meredith	Pontygwaith Communities First Office
426	Mr Colin Field	Network Rail Western
429	Mr James Parkin	Tonyrefail West Communities First Office
430	Mr Wayne Bannfield	Chamber of Trade Tonyrefail
448	Mr Ryan Bowen	Network Development Consultants
455	Mr Bryn Israel	c/o Tylorstown Communities First
456	Mr Clifford Jones	Chair, Blaenllechau Community Regeneration
458	Mr Gwyn Poole	Communities First
459	Mr Alun Taylor	Coalfield Regeneration Trust
468	Mr Keith Jones	KPL Precision Tooling and Die Sinking
473	Mr Edward Prosser	Chamber of Trade
477	Mr Ed Wallace	Powergen
482	Mr J Roberts	Pontypridd & District Chamber of Trade & Commerce
484	Mr Dave Fumage	Pontypridd YMCA
487	Mr Cenedd Thomas	Pontypridd RFC
502	Mr John Cooke	Ark Youth & Community Project
516	Mr Jonathan Jones	Wales Tourist Board
526	Mr Anthony Brown	Darranlas Communities First Co-ordinator
528	Mr J Knight	Pontypridd College
539	Mrs Lindsay Morris	Abercwmboi Communities First
542	Mrs P Morris	Gwaunmiskin Action Group
546		Confederation of Passenger Transport UK
554	Mrs Diane Elliott	Taxi Trade Association
555	Mrs Judith Toms	Chamber of Trade
568	Ms Diane Prosser	Dash Training
577	Ms Amanda Orrell	Cwmaman Communities First
580	Ms Christine Chapman, AM	Welsh Government
583	Ms Janet Lintern	Friends of the Earth
587	Ms Susan Sexton	Cwmdare Community Action Team
588	Ms Michaela Thomas	Gilfach Goch Communities First
590	Ms Mary Harvey	Glyncoch Communities First

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Rep No.	Name	Organisation
598	Ms Sally Jeffries	Royal Mail Property Holdings
604	Ms Olwen Chislett	Beddau Art Society
605	Ms Margaret Hannigan - Popp	Rhondda and Merthyr Groundwork Trust
606	Ms Marianne Williams	Fernhill Communities First
607	Ms Sandra Jones	Spectacle Theatre
609	Ms Ros Davies	Maerdy Communities First Co-ordinator
610	Ms Ruth Hopkins	Interlink
620	Ms Susan Davies	Chamber of Trade
621	Mr Manni Hothi	VALREC
622	Ms Carol Owen	RCT Local Health Board
625	Ms Margaret Jervis	Valleys Kids
640	Ms Polly Hearsey	BTCV
644	Ms Carol Banwell	Bradford & Bingley
650	Ms Margaret Morris	Taff Ely Access Group
674	Greg Byrne	Business Development Planning
675	Antonia Forte	DevCo Representative
678		Play Wales
683	Jay Linch	Llantwit Fardre Young People Project
685		Mid Glamorgan Scout Council
692		Powys County Council
695		Peterston - Super - Ely Community Council
697		Welsh St.Donats Community Council
698		Penllyn Community Council
699		Llangan Community Council
700	Mrs. Helen Treherne	Penyrheol, Trecenydd & Energlyn Community Council
702	Mr. A. Hoskins	Nelson Community Council
705		Blaengwrach Community Council
706	Mr. G. Morris	Glynneath Town Council
708	Miss Lucie Taylor	Planning Aid Wales
710	Mr Peter Huxtable	British Aggregates Association
711		British Geological Survey
712		Centre for Ecology & Hydrology
713		Civil Aviation Authority
714		The Gypsy Council

Rep No.	Name	Organisation
715	Julian Salmon	Country Landowners & Business Association
719		Welsh Environmental Services Association
721		Wales Council for Voluntary Action
722		Royal Institution of Chartered Surveyors
723		RTPI Cymru
724		Chartered Institute of Housing Cymru
725		Institution of Civil Engineers
726	Dr. Cathy O'Brien	The Chartered Institution of Waste Management
727		Rail Freight Group
728		One Voice Wales
729	Mr. Lee Cecil	The National Landlords Association
730		The Baptist Union of Wales
731		02 UK
732		T-Mobile
733		Vodafone Ltd
734		Three
735 (Church in Wales)	Mr Chris Hyde	C/o Cooke & Arkwright
736		Evangelical Movement of Wales
737		Muslim Council of Wales
738		The United Reformed Church
739		Presbyterian Church of Wales
740		The Methodist Church in Wales
741		Cardiff Buddhist Centre
744		UK Islamic Mission
747		Cardiff United Synagogue
748	Mr Alan Woodward	Rhigos Community Sports Association
750 (University of Glamorgan)	Mr Tim Gwent	1 Kingsway
762		Welsh Ambulance Services NHS Trust
763		Bro Morgannwg NHS Trust
764		The Princes Trust
913		Cofton

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Rep No.	Name	Organisation
916	Mr Jeremy Bladon	CSJ Planning Consultants Ltd
922	Mr Stuart Mollard	Jacobs Babbie
923	Mr Derek Ball	RPS Group plc
925	Mr Gary Sutton	The Development Planning Partnership
927		Morgan Cole
929 (Home Builders Federation)	Mr Scott Cadwell	Savills
930	Mr Robert Firth	Austin-Smith: Lord LLP
933	Mr Alasdair Denton	ECOTEC Research & Consulting
934	Mr Damian Barry	Atkins Planning Consultants
935	Mr Roger Prescott	Halcrow Group Ltd
936		Hodge & Co Property Holdings Ltd
937	Mr Gareth Davies	Stride Treglown Town Planning
941		Barbara Rees
942		John Thomas & Co
943		Seren Consulting Ltd
946	Mr Gareth White	Anthony Goss Planning
947	Mr Rhys Roberts	Cynefin Consultants
948	Mr Steve Anderson	Anderson Planning & Development
951		Welsh Government
955		Anwyl Construction Ltd
963		Burns B Builders Ltd
967	Mr Stephen Gibbins	Compton Developments Ltd
969		Cymric Private Developments (Swansea) Ltd
976		Hallam Land Management Ltd
977		Harrow Estates plc
979		Jones Brothers Weston Rhyn Ltd
985		Parfit Building Services
990		Stradform Ltd
1002	Professor Terry Marsden	Cardiff School of City & Regional Planning
1003		Arriva Trains Wales
1004		NTL
1007	Mr. David Cox	Renewable Energy Systems Ltd.
1009	Mr. Martin Harvey	Rodd Properties Ltd
1016	Mr. Chris Thomas	Chris Thomas Ltd
1019	Mr. Simon Jones	Capper & Co Ltd
1020	Mr Alex Wilson	Fulfords Land & Planning

## Report of Comments and Responses

Rep No.	Name	Organisation
1021	Nicola Vines	Alder King Planning Consultants
1023	Mr. Rob Copley	Janus, Lang & Lassalle
1025		Living Streets
1026		Arts Factory
1027	Mr. Steffan Webb	Menter Iaith Rhondda Cynon Taf
1028		Rhondda Cynon Taff Community Arts
1029		Urdd Gobaith Cymru
1030		Model House
1031		Home Office Direct Communications Unit
1034	Ms. K. Carter	Coychurch Higher Community Council
1035	Mrs. L. Lake	Ogmore Valley Community Council
1036	Mr. N. Davies	Pencoed Town Council
1037	Mrs. S. Harvey-Powell	Ystradfellte Community Council
1038	Miss H. Blair	Llanfrynach Community Council
1039		Pentyrch Community Council
1040	Mr. Mike Jones-Pritchard	Tongwynlais Community Council
1041	Mr. David Duncan	Rhondda Housing Association Disability Action Group
1043	Rev Canon Robert Reardon	Roman Catholic Archdiocese of Cardiff
1047	Mr. Graham Meiklejohn	EWS Railway
1048	Mr. Simon Pickering	Passenger Focus
1050		Travellers Aid Trust
1304	Mr. John E. Jeremy	
1305	Mr. David Welch	Welch Property Consultants
1312	Mr J P Swallow	Site Serv Ltd
1313	Mr. A.J. North	Wallis
1318 (Hanson Aggregates)	Mr Graham Jenkins	White Young Green Planning & Design
1324	Mr Isaac Benju	Anderson and Associates
1325	Mr Colin Boon	Colin Boon Associates
1339	Mr Nigel Dale	David Storer and Partners
1342	Mr D. M. Davies	
1346	Mr H. J. Davies	Lanyon, Davies & Evans
1350	Mrs P. Eacott	Blackwood Design Services

## Report of Comments and Responses

## Draft Charging Schedule

Rep No.	Name	Organisation
1353 (England Environmental)	Mr Andrew Muir	Harmers Ltd
1355	Mr Gerald Eve	Chartered Surveyed
1356	Mr Allan R. Fairfax	Fairfax & Co
1359	Mrs Samantha Frost	Riverlodge Retreat
1363	Mrs Thea Gregory	Taylor Woodrow Development LTD
1366	Mrs H. W. Griffiths	
1368	Mr David Hambly	BBA Architects
1370 (Graham Boyce & Glyn Howard)	Mr Keith Warren	Asbri Planning
1371	Mr Liam Higgs	Farrells Homecare
1372	Mr M. J. Hollingsworth	Ian Metcalfe & Co
1373		David Wilson Homes South West
1378	Mr David P S John	Pontypridd Market Company
1382	Mr D. Vivian Jones TechRICS	
1395	Mr Edmund Miles	Herbert R Thomas
1398	Mr Chris J Morgan	
1400 (Non Political Club)	Mr Laurence Force	Harmers Ltd
1401	Mrs H. L. Morgan	H.Morgan / George Stanely Ltd
1402	Mr John Morgan	John Morgan and Partners Solicitors
1409	Mr Anthony Owen	Durbin Professional Property Services
1411	Mr Simon Padfield	NSP Properties
1416	Mr Lyn W. Rees	
1423	Mr Robert Rogers	Robert Rogers Architects
1427	Mr Howard Smith	Clarke Associates
1431	Mrs Christine Sullivan	Sullivan Land and Planning
1439	Mr Peter G. Weavers	Headaway (Europe) LTD
1449	Mr R. D. Williams	Robert Williams Associates
1452		Walters Mining Limited
1455		Robertsons
1461	Mr. Clive Howell	Howell Bros
1463	Mr. P.J. Elliott	The Bute Development Company Ltd
1469	Mr Gareth James	James Partnership

Rep No.	Name	Organisation
1470 (Tinn Developments Ltd)	Mr David Walker	Harmers Ltd
1475	Ms Jill Evans	
1476		Newydd Housing Association (1974) Ltd
1479	Mr J Childs	C/O Theo Jones and Co
1482		Penhow Plant Hire Ltd c/o BS Technical Services
1483	Mr Andrew Lewis	Bute Surveyors
1487	Messrs Roberts and Peterson	
1488		Maindy Estates Ltd
1492		Representative body of the Church in Wales
1499	Mr Paul Vining	White Young Green Planning & Design
1505		DPDS Consulting Head Office
1507	Mr RPW Morse	Astleys chartered surveyors
1509 (Adrienne Ltd)	Mr Simon Kennedy	Kennedy James Griffiths
1519	Mr M Collins	Col brooke Partners
1527	M.E Davies	Borough Renovation Grants Agency LTD
1528	Mr John Matthews	
1532	Mr Richard Liddell	Liddell Associates
1537	Mr Raymond Pye	HASPS Term Partnership
1541		Rawlins and Madley
1542	Mr Chris Pike	Savell Bird & Axon
1546	Mr Chris Aubrey	KTP/Chris Aubrey and co solicitors
1550		Traveller Law Reform Project
1563 (Visual Homes)		Castle Solicitors
1575	Mr. Gregory Byrne	Gregory Byrne & Associates
1590	Mr. Dewi Hughes	Taylor's / Mordecai's Fields Allotment Association
1637	Mr. Gareth Davies	Cadarn Housing Group
1646	Mr. John Woodruff	BWEA Natural Power Consultants
1823	Dr Tony Yule	Taf Ely (Llantrisant) Ramblers Association
1833	J S Humphreys	Aber Valley Community Council
1872	Mr. Richard Dodd	Valleys Bat Group / Grwp Ystumod y Cymoedd

## Draft Charging Schedule

Rep No.	Name	Organisation
1901	Anthony Carter	Celteiddwyr
1930	Mrs. M L Middlehurst	Fernhill Rhondda Conservation Group
1940	D Manuel	Cefn & Mwyndy Residents Association
1946	Ms. Wendy Morgan	YGG Pontsionnorton
1960		Communities and Local Government
1964	Roger Tym	Roger Tym & Partners
2018 Westgate Park (Llantrisant) Ltd		John Matthews Planning
2022 The Treforest Unit Trust (C/O SEGRO)	Mr John Pearce	Barton Wilmore (Birmingham Office)
2027 (Forgemasters)	Mr John Evans	Jaylae Consulting LLP
2028 (Western Power Distribution)	Miss Zoe Abberley	DTZ Pieda Consulting Cardiff
2030 (Llandaff Diocesan Board of Finance)	Mr Laurence Force	Harmers Ltd
2031		Wingfield Estates
2034		Messers John Davies and Paddison
2035	Mr. J. Morgan (Estate of)	
2043		W M Morrison Supermarkets PLC
2045 (Somerfield Stores Ltd)	Ms Camille Richards	Roger Tym & Partners
2047 (Scarborough Development Group plc)	Mr Peter Waldren	White Young Green Planning & Design
2050 (Bridgend College)	Mr Peter Waldren	White Young Green Planning & Design
2052 (National Grid)	Mr Damien Holdstock	Entec UK Ltd

## Report of Comments and Responses

Rep No.	Name	Organisation
2053 Ref: GJ/CP/A025 986 (Tarmac Ltd)	Mr Graham Jenkins	White Young Green Planning & Design
2056	Ms Dilys Howells	South East Wales Energy Agency
2062	Mr Michael Skinner	Jehovah's Witnesses-Circuit Planning
2075		Sporting Marvels
2080 (Maxibrite Ltd)	Mr Mark Roberts	RPS Planning & Development
2146	Mrs Rosemary Thomas	Welsh Government
2185	Mr Nick James	Rees Richards
2196	Mr Tim Roberts	DLP Planning Ltd.
2197	Karen Roberts	Cwm Clydach Communities First Partnership
2199	Ms Sian Daffanaike	Fusion Online Ltd
2201		Freeman Homes
2205	Mr Glyn Mabey	St James Parade
2208	Mr Robert Emanuel	Emanuel Jones Chartered Surveyors
2209	Mr Pankaj Bakshi	Hodge Bakshi
2210	Ms Tanya Davies	Npower Renewables
2223	Mr P. Watkins	Woodland Leaves
2229	Ms Sioned Haf	Cymdeithas yr Iaith
2235	Mr D. L Williams	Robertson Francis Architects
2237	Ms Sarah Williams	Rowland Jones & Ptnrs
2246	Claire Norris	Lambert Smith Hampton
2249	Mr Lee Weatherall	
2251	Ms Carol Owen	National Public Health Service for Wales
2257	Mr Clive Long	Primary Asset Ltd
2258	Mr James Edwards	Colliers CRE
2265 (King Sturge LLP)		McDyre & Co
2282	Andrew Davies, AM	Welsh Government
2283	Bethan Jenkins, AM	Welsh Government
2287	Mr Ian Dunston	Wales & West Utilities
2296	Mr Mark Flood	Wilbraham Associates Limited
2297	Mr David Rees	Bute Development Company Ltd
2300	Ms Jacqueline Hayter-Rogers	South Wales Police
2303		Smith and Tuckwood Partnership
2310	Mr Richard Frost	Bruton Knowles

## Report of Comments and Responses

## Draft Charging Schedule

Rep No.	Name	Organisation
2311	Ms Nicola Berry	Pegasus Planning Group
2316	Mr Mark Farrar	Powell Dobson
2318		Capita Symonds Glamorgan Consultancy
2321	Mr David Bell	LDA Design
2322		CB Richard Ellis
2323	Ms Jayne Komor	Health, Social Care & Well-being
2338		Dewis Centre for Independent Living
2339		Learning Disability Wales
2340		Disabled Children's Team
2343		Age Concern - Community Outreach Team
2344	Mr Robert Antonio	Pathways to adapted Housing
2347		Rhondda Cynon Taf Youth Offending Service
2350	Ms Rhian Dash	Cancer Support Cynon Valley, Rhondda Cynon Taf
4796 (Wingfield Estates)	Mr Andrew Muir	Harmers Ltd
2355		GMD Centres for Deaf People
2356		The Ark Youth and Community Project
2357		Chequers Youth Facility
2359		Welsh Scout Council
2360		Fernhill Youth Project
2362		Mountain Ash YMCA
2363		Penygraig Community Project
2365		National Council of YMCA's of Wales
2366		Penderyn Youth Project
2368		Ystrad Boys and Girls Club
2371		Shelter Cymru
2373		Nebo Sheltered Accommodation Complex
2375		Apex Charitable Trust Ltd
2376		Rhondda Cynon Taf Youth Offending Service
2377		Nacro
2378		The Salvation Army
2379		Pontypridd Womens Aid Information Centre
2380		Valley of Hope

Rep No.	Name	Organisation
2387	Mr David Morris	Pre-Hospital Emergency Care Training Agency
2398	Ms Pauline Jones	Secretary of Rhondda Riding Club
2505		Equality and Human Rights Commission
2516		GMB
2526		Ynysangharad Surgery
2530		V. Griffiths & Sons Ltd
2569	Mr Travis Wattlely	
2826	Ms Jenny O'Hara Jakeway	Glyncoch Community Partnership
2985	Mr Steve Staines	Friends, Families & Travellers
3014	Mr Nigel Brock	Brocks Engineering Ltd
3087	Mr David Whiteman	Saurus Ltd (UK)
3116	Mrs Stephanie Davies	Briars Bridleways
3193	Mrs Hannah Gulwell	Green and Friendly Action (Glyncoch)
3199	Dr Stuart Watcham	Technia Business Solutions Ltd.
3201	Mr Michael Edwards	Maes-y-coed Primary School
3203	Mr Alun Cox	Rhondda Constituency Plaid Cymru
3215	Nicola Davies	Rhondda Cynon Taff Local Health Board
3234	Mrs Jeanne Hyett	British Horse Society
3235 (Centrica Energy)		Geddes Consulting
3236 (Nuon Renewables )	Mr Fergus Charlton	Burges Salmon LLP
3240 (South Wales Fire and Rescue Service)	Mr Mark Farrar	Powell Dobson
3241 (Ludlow Street Investments Ltd)	Mr G. Powys-Jones	G Powys Jones
3246 (Garrison Barclay Estates Ltd)		John Matthews Planning
3249 (Messrs Davies & Millichap)	Ms Lorraine Jones	Watts & Morgan

## Draft Charging Schedule

Rep No.	Name	Organisation
3251 (Alexon International Limited)	Mr Geraint John	Savills
3254 (Southward Properties Ltd)	Ms Zoe Abberley	Barton Wilmore
3260 (Jointly with Mrs A. Brown)	Mr Keith Warren	Asbri Planning
3265 (C/O Smith & Tuckwood)	Mr Keith Warren	Asbri Planning
3267 (R & A Williams & L Jenkins)	Mr Keith Warren	Asbri Planning
3268 (Dowlais Top Investment Company Limited)	Mr Roger Leek	Leek & Weston Ltd
3272 (Piper Homes)	Mr Andrew Lucas	RPS Planning & Development
3278 (Service Land Fund (No. 1) Ltd)	Mr Peter Nelson	Camland Developments Ltd
3280 (Elete Design Ltd)		Owen Banks Planning & Development
3281 (Macob)	Mr Chris Cox	Marchmount House
3286 (Aknan Global Developments)	Ms Carolyn Jones	RPS Planning & Development
3289 (Phoneray Limited)	Mr Andrew Muir	Harmers Ltd
3292 (Cwm Taf NHS Trust)	Mr Louis Chicot	Louis Chicot Associates
3295 (Valad Developments (Llantrisant) Ltd)	Mr Peter Waldren	White Young Green Planning & Design
3296 (Dorchester Land)	Mr Keith Warren	Asbri Planning

## Report of Comments and Responses

Rep No.	Name	Organisation
3297 (Edwards Coaches)	Mr Keith Warren	Asbri Planning
3299 (Harkins Haulage)	Mr Keith Warren	Asbri Planning
3303 (KGJ Price (Railway Sleepers) Ltd.)	Mr Keith Warren	Asbri Planning
3304 (Mr. Brian Clarke)	Mr Keith Warren	Asbri Planning
3305 (Cockspur Property Limited)	Mr Derek Ball	Blue Sky Planning Ltd
3308 (Scarford (Hirwaun) Ltd)	Ms Kate Gapper	RPS Planning & Development
3313 (RREEF Ltd & SWIP (Scottish Widows Investment Partnership))	Mr Arfon Hughes	DDP
3314	Mrs Leanne Wood, AM	Welsh Government
3315 (Arena Supplies Ltd)	Ms Angela Khudonazarova	Parsons Brinckerhoff
3377	Ms Theresa Parsell	CwmNi
3395	Mr Andrew Bromley	Mineral Products Association Ltd
3396	Mr Chris McGough	Warner Ashtenne
3409	Mr Lyndon Bengough	Ymlaen Glyncoch
3433	Ms Rebecca Mattingley	Sports Council for Wales
3438	Ms Rose Freeman	The Theatres Trust
3440	Mr Gwyn Smith	Sustrans
3450 (Crabtree & Evelyn)	Mrs Madeline Palmer	C.B. Richard Ellis
3451	Mr Lee Hayward	BBC Cymru Wales
3582 (Credit Suisse)	Mr Derek Ball	Blue Sky Planning Ltd
3583		Caerphilly Town Council
3584	Mrs Judith Roberts	Pendoylan Community Council

## Report of Comments and Responses

## Draft Charging Schedule

Rep No.	Name	Organisation
3585	Ms Barbara Waldon	Country Land and Business Association
3593	Ms Maria Battle	Consumer Focus Wales
4164	Mrs Ellen Henshaw	Tonyrefail Scout Group
4198	Ms Su J Curtis	Lafage Aggregates Ltd
4200	Ms Madeline Palmer	Melia Kesh Ltd
4640	Fiona Morgan	Cardiff University
6000		HLN Architects Ltd
6001	Mr Paul Overton	
6002	Mr Stewart Lowther	Atmos Consulting
6003	Mrs Davies	
6004	Mr David Evans	
6005		
6007		DMC Partnership
6008	Mr & Mrs T. R. Cole	
6009	Mr Peter Nelson	Camland Developments Ltd
6010		C/o Mitchell & Butler Plc
6011		C/o Mitchell & Butler Plc
6012		Cofon (Wales)
6013		British Independent Retailers Association
6014		Taylor Whipmy Homes
6015	Mr Mark Scoot	Amethyst Properties Investments Ltd
6016		Anchor Mill Homes
6017 (W.M. Morrisons Supermarkets plc)	Ms Clare Dickinson	Peacock & Smith
6018		Evans & Traves LLP
6019 (McCarthy & Stone Retirement Lifestyles Ltd)	Mr Ziyad Thomas	The Planning Bureau Limited
6020		Castle Solicitors
6021		J.J. Hatfield & Co Ltd
6022		Malcolm Judd & Partners
6023	Mr Fergus Charlton	Burges Salmon LLP
6024		WDA Property Investments Ltd
6025	Ms Jo-Ann Middleton	Crest Nicholson (South West) Ltd
6026	Mr Keith Simmonds	Bryant Homes by Taylor Woodrow
6027		Sutherland PLS Ltd
6028	Mr Michael Phillis	

Rep No.	Name	Organisation
6029	Mrs Madeline Palmer	C. B. Richard Ellis
6031		G Powys Jones
6032		Lamb & Co
6033	Mr Rob Peters	Turley Associates
6034	Mr Gareth Williams	Nathaniel Lichfield & Partners
6035	Miss Holly Atkinson	AECOM
6036		Town Planning Consultancy
6037		Barton Wilmore
6038		GVA Grimley Ltd
6039	Ms Emma Langmaid	Prospero Planning
6040	Mr Scott Cadwell	Savills
6041	Mr Afron Hughes	Development Planning Partnership
6042	Mr Gerald Evans	
6043	Mr Mike Catris	MCSB
6044		Tribute Homes Ltd
6045	Mr Shawn Cullen	Atisreal UK
6046	Miss Clare Harrison	PNB Paribas Real Estate
6047		Network Management Group
6048		DTZ Pleda Consulting
6049	Mr Simon Lloyd	Cooke & Arkwright
6050		Pentan Partnership
6051		British Dental Association Wales Office
6052		Capital Law Commercial
6053	Mr Simon Power	ARUP
6054	Mr Sean Hannaby	Scott Brownrigg
6055		United Welsh Housing Association
6056	Mr Ian McDonald	
6057	Ms Angela Khudonazarova	Parsons Brinckerhoff
6058	Mr Gareth Hooper	DPP
6059		AMEC
6060		Kings Court (Wales) Ltd
6061	Mr Geraint John	Geraint John Planning
6062		Lawray Architects
6063		DCD Planning
6064		Building Logistics
6065		Connections Design
6066	Mr Ron Milson	
6067	Mr Andrew Muir	Harmers Ltd
6068	Mr Steve Williams	Charles Church Wales
6069		Welsh Health Estates
6070		Barratt Homes

Rep No.	Name	Organisation
6071		Coleg Morgannwg
6072		Ball & Co
6073		C.T. Design Services
6074		Lovell
6075	Mr J.I. Herbert	Herbert. D Builders Ltd
6076	Mrs Jane Carpenter	Redrow Homes (South Wales) Ltd
6077	Mr Owen Jones	Boyer Planning
6078	Mr Simon Kennedy	Kennedy James Griffiths
6079		Asbri Planning
6080		George Wimpey
6081		Spire Healthcare (Cardiff Office)
6082	Mr Peter Waldren	White Young Green Planning & Design
6083		Glamorgan & Gwent Housing Association Ltd
6084		Linc-Cymru Housing Association
6085		Wales and West Housing Association
6086		C2J Architects
6087		Aelwyd Housing Association Ltd
6088	Mr John Evans	Jaylae Consulting LLP
6089		Kelvin Francis & Co
6090	Mr David Jones	Hyder Consulting UK Ltd
6091	Mr David McLean	
6092		Elan Homes Southern Ltd
6093	Mr Gyan Ghuman	Parkgrove Ltd
	Mr Mick Antoniw	Welsh Government
	Ms Victoria Bolton	Newydd Housing Association
	Mrs Jane Carpenter	Redrow Homes (South Wales) Ltd
	Mr Paul Foley	Aldi UK Head Office
	Mrs Antonia Forte	Pontypridd & District Housing Association
	Mr Andrew Freeguard	Rhondda Cynon Taf Homes
	Mr Simon Grey	Llanmoor Development Co.Ltd
	Ms Cerys Lewis	Lewis Homes
	Mrs Carol Owen	RCT Local Health Board
	Mr Mark Slater	Bovis Homes Ltd
	Mr Owen Smith	House of Commons
	Mr Sean Tristran	Rhondda Housing Association
	Mr Williams	Mid Rhondda Chamber of Trade

## Appendix 5: Web Page

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- Older People
- Parents / Guardians
- Students
- Tourists
- Young People

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### Community Infrastructure Levy

**What is the Community Infrastructure Levy (CIL)?**

The Community Infrastructure Levy (CIL) is a new levy that local authorities in England and Wales can choose to charge on new developments in their area.

The finance generated from CIL will be used to fund the provision of new or improved infrastructure that will support new development in the region. This could include new roads, public transport and schools.

The fixed charge will apply to the development of at least one new dwelling and/or other new commercial development over 100 sq m in floorspace.

**What is the proposed CIL level?**

For residential development the CIL charge is proposed at different rates in 3 zones across the County Borough. For commercial development a single charging zone will apply for the respective CIL rates shown below.

Cil Zone Maps (click to enlarge)

Residential Rates		Commercial Rates	
Zone	CIL Rate per sq m	Development	CIL Rate per sq m
1	£0	Retail (A1)	£100
2	£40	Retail (A3)	£25
3	£100	Primary Healthcare (D1)	£60

**How will CIL work?**

If you build a new house with a typical floorspace of 90 sq metres you will pay a CIL charge of:

Zone 1 - no charge  
 Zone 2 (£40 per sq metre) = £3,600  
 Zone 3 (£100 per sq metre) = £9,000

If you build a new shop, a single charge will be payable at £100 per sq m. The CIL charge will not apply to existing retail development.

**What will CIL money be spent on?**

CIL money will be spent on the infrastructure required to support development in the County Borough. The Council has identified a number of projects and infrastructure in its Local Development Plan, which are required to support new growth.

**When will the local CIL come into force?**

Stage	Proposed Timescale
Consultation on Preliminary Charging Schedule	November 2012/January 2013
Consultation on Draft Charging Schedule	July / August 2013
Examination	January / February 2014
Inspector's Report	March 2014
Implementation of CIL	April 2014
Annual Monitoring Report	December 2015

**CIL Regulations and Guidance**

Further information on CIL is available by clicking the links below:

Document	Date
The Community Infrastructure Levy (CIL) Regulations	2010
The Community Infrastructure Levy (Amendment) Regulations	2011
Department for Communities and Local Government (DCLG) CIL Guidance	
Rhondda Cynon Taf CIL Newsletter	2012
CIL: Preliminary Charging Schedule	2012
Economic Viability Study	2012
Infrastructure Assessment Background Paper	2012

If you require further assistance please contact:

Rhondda Cynon Taf County Borough Council  
 Spatial Development Team  
 Regeneration and Planning  
 Floor 3  
 Sardis House  
 Sardis Road  
 Pontypridd  
 CF37 1DU

Tel: 01443 494735  
 E-mail: LDP@rhondda-cynon-taf.gov.uk

### Appendix 6 Public Notice

Planning Act 2008  
Planning and Compulsory Purchase Act 2004  
Community Infrastructure Levy, England and Wales  
Community Infrastructure Levy Regulations 2010  
The Community Infrastructure Levy (Amendment) Regulations 2011

#### Notice of Consultation of Rhondda Cynon Taf Community Infrastructure Levy (CIL) Draft Charging Schedule (Regulation 16)

Rhondda Cynon Taf County Borough Council hereby gives notice that it has published for inspection the Rhondda Cynon Taf Community Infrastructure Levy (CIL) Draft Charging Schedule.

This has been prepared in accordance with the CIL Regulations 2010 (as amended) and the Planning Act 2008 (as amended). The Draft Charging Schedule and other supporting evidence is available for inspection free of charge in the Council office at Sardis House, Sardis Road Pontypridd, from the 27<sup>th</sup> June - 7<sup>th</sup> August 2013.

The documents will also be available in the following locations throughout Rhondda Cynon Taf during their opening times; Council offices: The Pavilions, Clydach Vale; One for All Centres: Rock Grounds Aberdare, Bronwydd House Porth, Treorchy Library and Mountain Ash Library and in Libraries at Abercynon, Aberdare, Beddau, Church Village, Cilfynydd, Cwmbach, Femdale, Glyncoch, Hirwaun, Llantrisant, Maerdy, Mountain Ash, Nantgarw, Penrhwi-ceiber, Penygraig, Pontyclun, Pontypridd, Porth, Rhydyfelin, Ton Pentre, Tonypany, Tonyrefail, Treherbert, Treorchy, Tylorstown, Ynyshir, Ynysybwll and the mobile library service.

Documents are also available to view on the Council's Website at: [www.rhondda-cynon-taf.gov.uk](http://www.rhondda-cynon-taf.gov.uk)

Representations (including objections) in respect of the Community Infrastructure Draft Charging Schedule should be sent in writing to Simon Gale, Service Director of Planning, Floor 3, Sardis House, Sardis Road, Pontypridd, CF37 1DU or made on line at [www.rhondda-cynon-taf.gov.uk](http://www.rhondda-cynon-taf.gov.uk) or via email at [ldp@rctcbc.gov.uk](mailto:ldp@rctcbc.gov.uk) before 5.00pm on the 7<sup>th</sup> August 2013. Representations (including those taking the form of objections) should specify the matters to which they relate.

Further information is available from [www.rhondda-cynon-taf.gov.uk](http://www.rhondda-cynon-taf.gov.uk) or at the following address:

Spatial Development Team  
Regeneration and Planning  
Floor 3  
Sardis House  
Sardis Road  
Pontypridd  
CF37 1DU  
01443 494735

Deddf Cynllunio 2008  
Deddf Cynllunio a Phrynu Gorfodol 2004  
Ardoll Seilwaith Cymunedol, Cymru a Lloegr  
Rheoliadau Ardoll Seilwaith Cymunedol, 2010  
Rheoliadau Yr Ardoll Seilwaith Cymunedol (Diwygiad) 2011

#### Rhybudd o'r ymgynghoriad ar Restr Ddrafft Codi Tâl Ardoll Seilwaith Cymunedol (ASC) Rhondda Cynon Taf (Rheoliad 16)

Mae Cyngor Bwrdeistref Sirol Rhondda Cynon Taf yn rhoi rhybudd ei fod wedi cyhoeddi'r Rhestr Ddrafft Codi Tâl Ardoll Seilwaith Cymunedol (ASC) Rhondda Cynon Taf ar gyfer ei archwilio.

Cafodd hyn ei baratoi yn unol â Rheoliadau 2010 ASC (fel y'i diwygiwyd) a Deddf Cynllunio 2008 (fel y'i diwygiwyd). Mae'r Rhestr Ddrafft Codi Tâl a thystiolaeth ategol arall ar gael i'w harchwilio am ddim yn swyddfa'r Cyngor yn Nhŷ Sardis, Heol Sardis, Pontypridd, o 27ain Mehefin - 7fed Awst 2013.

Bydd y dogfenau hefyd ar gael yn y lleoliadau canlynol ledled Rhondda Cynon Taf yn ystod eu horiau agor. Swyddfeydd y Cyngor: Y Pafilynnau, Cwm Clydach; Canolfannau ibobun: Rock Grounds Aberdâr, Tŷ Bronwydd y Porth, Llyfrgell Treorci a Llyfrgell Aberpennar ac yn llyfrgelloedd Abercynon, Aberdâr, y Beddau, Cilfynydd, Cwmbach, Glynrhedynog, Glyn-coch, Hirwaun, Llantrisant, Y Maerdy, Aberpennar, Nantgarw, Pendyrus, Penrhwi-ceiber, Penre'r Eglwys, Pen-y-graig, Pont-y-clun, Pontypridd, Y Porth, Rhydyfelin, Ton Pentre, Tonypany, Tonyrefail, Treherbert, Treorci, Ynyshir, Ynysybwll a'r gwasanaeth llyfrgell deithiol.

Gallwch hefyd eu gweld ar wefan y Cyngor ar: [www.rhondda-cynon-taf.gov.uk](http://www.rhondda-cynon-taf.gov.uk)

Dylai sylwadau (gan gynnwys gwrthwynebiadau) mewn perthynas â'r Rhestr Ddrafft Codi Tâl y Seilwaith Cymunedol gael eu hanfon yn ysgrifenedig at Simon Gale, Cyfarwyddwr Gwasanaethau Cynllunio, Llawr 3, Tŷ Sardis, Heol Sardis, Pontypridd, CF37 1DU neu ar-lein ar [www.rhondda-cynon-taf.gov.uk](http://www.rhondda-cynon-taf.gov.uk) neu ar e-bost at [ldp@rctcbc.gov.uk](mailto:ldp@rctcbc.gov.uk) cyn 5.00pm ar 7fed Awst 2013. Dylai sylwadau (gan gynnwys y rheiny sydd ar ffurf gwrthwynebiadau) nodi'r materion y maen nhw'n ymwneud â nhw.

Mae rhagor o wybodaeth ar gael ar [www.rhondda-cynon-taf.gov.uk](http://www.rhondda-cynon-taf.gov.uk) neu o'r cyfeiriad canlynol:

Datblygu Gofodol  
Adfywio a Chynllunio  
Llawr 3  
Tŷ Sardis  
Heol Sardis  
Pontypridd  
CF37 1DU  
01443 494735

## Appendix 7: List of Representors

Representor No	Representor	Organisation
6330	Mrs Pauline Elliot	Caerphilly County Borough Council
2146	Mrs Rosemary Thomas	Welsh Government
6340	Miss Gillian Barter	Natural Resources Wales
715	Mr Charles de Winton	Country Land & Business Association
6191	c/o White Young Green	Sainsbury's PLC
306	Miss Rachael Bust	The Coal Authority
426	Mrs Barbara Morgan	Network Rail Western
3438	Ms Rose Freeman	The Theatres Trust
6341	c/o Savills	House Builders Federation Consortium
6019	c/o The Planning Bureau Ltd	McCarthy & Stone Retirement Lifestyles Ltd
6354	Mr B K Mead	Meadbro Investments
1575	Mr Gregory Byrne	Gregory Byrne and Associates
6015	c/o Amethyst Properties Investments Ltd	CPL Industries
6125	Mr Matthew Worton	Rhondda Housing Association
6142		Cynon Taf Housing Association
6152		Hendre Housing Association
6337	Mr Rhydian Clement	Welsh Water
	c/o White Young Green	Talbot Green Developments Ltd
1476	Mrs Elsie Coalter	Newydd Housing Association
6250	Mr Louis Chicot <u>Late Representation Received</u>	Cwm Taf Health Board (Robertstown)
6343	Mr. Paul Western	Cwm Taf Health Board (Primary Care)

## Appendix 8: Schedule Representations and Responses

<b>Representor No : Gregory Byrne and Associates</b>
<p><b>Comments</b></p> <p>Thank you for inviting my comments on the draft CIL. I have now had the opportunity to peruse your draft document and make the following observations:</p> <p>We have an economy throughout the UK that is “flat-lining” and with little growth prospects in the foreseeable future; with the prospects for Wales in general sadly much worse – any additional “growth taxes” should be avoided, and the CIL is such a “growth tax”. Whatever RCTCBC’s own financial difficulties – the proposed CIL is a bad initiative for RCT and may cost more in lost opportunity than it generates in levy funds, I hope our local politicians can see their way to rise above a narrow self-interest for the Council.</p> <p>I see from the Map that there is a number of zones with different charging regimes, and as I fear there will not be the political vision and courage to rise above the Council’s self-interest referred to above, I suggest the following revisions: Zone 1 (Nil charge) should be extended southwards to a line approximating to Rhydfelin in Pontypridd, and the remainder of the County Borough should be classed as your proposed Zone 2. Zone 3 should be scrapped altogether as likely to be seriously detrimental to RCT’s growth prospects.</p>
<p><b>Council’s Response</b></p> <p>The Council recognises that the economic downturn has significantly impacted upon growth locally, regionally and nationally. In the development of its CIL, the Council has sought to strike a balance between supporting growth across the County Borough and funding the infrastructure upon which new development will rely.</p> <p>Based of the economic viability study prepared by the District Valuer, the Council believes it has struck an appropriate balance both in terms of rates and charging zones. The Council disagrees with the proposed revisions to the charging zones. No viability evidence has been submitted to support revisions to the charging zones.</p>
<p><b>Recommendation:</b> No change required.</p>

<b>Representor No : Natural Resources Wales</b>
<p><b>Comments</b></p> <p>NRW welcome the work that has been undertaken in the preparation of this document. Detailed comments are:</p> <p>Paragraph 3.2: Typographical error: We suggest that the reference to “£253m” should be replaced with “£243m”, to ensure consistency with figures set out in the <i>Infrastructure Assessment Background Paper</i> (Revised March 2013).</p>

Appendix A: Typographical error: The Draft Infrastructure List should be dated April 2013, not May 2013.

### Council's Response

Comments noted.

**Recommendation:** Typographical errors to be corrected in Infrastructure Assessment Background Paper.

**Representor No : Cwm Taf Local Health Board**

### Comments

1. It is appreciated that the consultations in respect of the CIL Draft Charging Schedule and the Draft SPG Planning Obligations are separate. However, as the Draft SPG explains how the council intends implementing the CIL regime, in practice the two are inseparable. Furthermore, changes in the application of the CIL regime via the SPG may well result in the council amending the Draft Charging Schedule. Therefore, I have prepared this single note to address both draft documents.

2. The Draft Infrastructure List (April 2013) specifies "*Education Projects including:*" before listing four such projects. It does not specifically exclude any education projects and therefore by virtue of s123 of the CIL regs., education being a "*type of infrastructure*", contributions towards education projects cannot be lawfully sought via a s106 contribution. Nevertheless, the paragraphs 4.16 and 4.17 of the Draft SPG specifically state that such contributions will be sought in the Northern Strategy Area.

3. It is accepted that s13 of the CIL regs specifically allows for the authority to set differential charging rates across different zones within its area. However, this provision does not provide for the exclusion of a type of infrastructure project, such as education, from the CIL regime. Specific schemes in certain circumstances may be so excluded, but these will be rare exceptions.

4. In addition, the scope of the contributions payable for transport, outdoor recreation facilities, environment, landscape, biodiversity and public health, as described in the Draft SPG, appear to extend beyond site specific infrastructure requirements. For example, once five contributions towards the provision of sports pitches (a "*type of infrastructure*") have been agreed in the council area, no further contributions can be lawfully required. Such implications do not appear to be reflected in the SPG and may therefore have an impact on the Draft Charging Schedule.

### Council's Response

The CIL Regulations allow the Council to decide what infrastructure will be funded through CIL. It is the Council's intention that the revenue raised through the CIL process will be used to fund transportation and education projects in the County Borough and the Draft Infrastructure List identifies the infrastructure the Council intends to fund. Whilst this

list is unlikely to change, it will not be finalised until the commencement of CIL and could be subject to change. This includes the wording used and the comments in relation to the use of 'including' are noted.

Paragraph 2.5 of the Draft Planning Obligations SPG identifies the legal tests that planning obligations are required to meet. Paragraph 3.6 makes clear that no more than five separate planning obligations can be used to fund one infrastructure project. The Council's CIL/S106 framework will ensure that, where required, planning obligations are secured for a clearly defined project or piece of infrastructure and are not secured as a general contribution for a type of infrastructure. In accordance with the relevant legislation, no more than five obligations will be secured to fund one project.

**Recommendation:** No change required.

**Representor No : Sainsbury's Supermarkets Limited**

### Comments

#### Discretionary Relief

Our client Sainsbury's Supermarkets Limited (SSL) wishes to highlight their general support for the Draft Community Infrastructure Charging Schedule (June 2013). On behalf of our client, these representations provide comments and precedents set in regard to the approach to discretionary relief in relation to Exceptional Circumstances (Regulation 55-58). Our comments seek to ensure that Rhonda Cynon Taff County Borough Council (RCTCBC) pay due regard to the need to ensure that the combined weight of obligations do not render development in the Borough unviable on the application of the Community Infrastructure Levy (CIL). We note the apparent absence of any modelling of major developments, comparable to the scale of the Talbot Green town centre, which have very significant on-site infrastructure requirements. The viability modelling fails to account for consented schemes which become subject to 'fresh' planning applications (e.g. for revisions to layout) after the adoption of CIL, triggering the need for contributions. Such contributions could result in 'double dipping' payment in the instance where an existing s106 Agreement has already secured relevant Strategic Infrastructure (or contributions towards), or could result in combined obligations. We raise concern that major developments could be rendered unviable due to the combined impact of s106 payments and CIL. In the context of economic uncertainty there is a need to have a discretionary relief policy to ensure chargeable development remains viable development. In our opinion, the extent of previously delivered and future obligations should be considered when assessing the viability of a scheme, and in determining eligibility for Exemption Circumstance from CIL in accordance with the CIL regulations at the current time.

At the time of making these representations SSL have received, as joint applicants with Talbot Green Developments Limited (TGDL), a resolution to grant permission for a 10,801sqm (GEA) supermarket, 573 space car park, petrol filling station and associated access roads, infrastructure and landscaping. The resolution was made to grant full planning permission subject to a Planning Obligation under s106 of the Act ensuring

payment of (inter alia) £2.05M for strategic highway infrastructure, described in the committee report as improvements to the roundabout junction of the A4119/A473. One of the transport projects included on the Councils Regulation 123 Draft Infrastructure List relates to the improvement of the A4119/A473 roundabout. The trigger points contained in the s106 agreement for making this payment results in the full amount being paid within 6 weeks of having commenced development.

The development programme requires the provision, by TGD, of significant new access infrastructure to serve the site as well as provision of a serviced plateau for the supermarket itself. The provision of these site preparation/access works are envisaged to take approximately 12 months, after which construction of the supermarket by SSL will commence. Accordingly, the £2.05M strategic highway s106 payment will have been made some 11 months prior to construction of the store commencing. Retailing is a particularly dynamic sector of the economy with constant data analysis refining the ultimate end product. Accordingly, SSL's models, standards and specifications frequently change to ensure developments are fully cognisant of the latest thinking. It is possible, or even likely, therefore that the precise form of development will differ from that which has been resolved to be approved, necessitating a further planning submission. In Wales, there is no scope to submit a Minor Material or Non Material Amendment and accordingly the only options to seek approval for any change would be to either (a) seek to vary a condition listing the approved plans or (b) apply for a new full planning permission. Unfortunately, the conditions set out in the committee report contain no condition listing the approved plans and while we have requested one be added, it is not clear at time of writing whether such a request will be granted. In such circumstances it appears that a new application would be required for even a relatively minor and acceptable change to the approved development.

While the Community Infrastructure Levy (Amendment) Regulations 2012, which came into effect on 28 November 2012, introduced a recognition that applications made under s73 of the Act might hitherto have resulted in an overpayment of CIL, there is no similar provision for new applications for full planning permission (under s57), even if such an application were materially similar to a previously approved permission and resulted in no increase in floorspace (indeed, even if they resulted in a reduction in floorspace). The outcome of the above is that:

- Should permission be granted with no condition listing the approved plans (thus precluding a s73 application); and
- Should development of the site preparation/access works commence, thus triggering payment of the £2.05 highway infrastructure payment (for works to the A4119/A473 junction, which is included on the Council's Regulation 123 list); and
- Should SSL wish to alter the development in any way such that a new planning application is required; and
- Should such an application be determined after CIL comes into effect (as seems entirely possible given the current development programme and published timetable for introducing CIL);

Then, notwithstanding the fact that the development's share of its Regulation 123 infrastructure burden (£2.05M) will already have been paid and notwithstanding any implications for scheme viability, a further CIL payment would be required (calculated at broadly £1,000,000). This would be grossly unfair and would in effectively constitute

'double dipping'. Regulations 55 to 58 allow charging authorities to set discretionary relief for exceptional circumstances to allow the charging authority to avoid rendering sites with specific and exceptional cost burdens unviable should exceptional circumstances arise. We believe that the above scenario constitutes exceptional circumstances. Before granting discretionary relief, the charging authority will need to be satisfied that the costs relating to the section 106 agreement (which we assume must include the section 106 agreement relating to the original permission) are greater than those related to the Community Infrastructure Levy, and that the relief would not constitute notifiable State Aid. We believe these stipulations would be met.

### **Proposed Statement of Common Ground or Memorandum of Understanding**

In a similar set of circumstances to those outlined above, the London Borough of Brent and Quintain Estates and Development plc prepared and signed a Statement of Common Ground on 12th November 2012. The statement formalised areas of agreement in relation to the CIL -Draft Charging Schedule between the two parties to address the circumstances prior to the adoption of the CIL Charging Schedule. As with the Talbot Green development, the s106 agreement pre-dated the Charging Schedule coming into effect and accordingly included infrastructure to both directly mitigate on site impacts, and to serve the wider needs of the area.

We request that a Statement of Common Ground or Memorandum of Understanding is also prepared and signed in advance of examination to assist the Examiner in addressing the concerns outlined above. In these similar circumstances, we wish to address our client's unease and to avoid 'double dipping' for Strategic Infrastructure and to ensure certainty for developers in assessing viability in regard to progressing their schemes.

### **Council's Response**

The condition suggested by the objector has been attached to the relevant consent. Condition 2 of the planning permission is as follows:

The development hereby approved shall be carried out in accordance with the following approved plans, unless otherwise to be approved and superseded by details required by any other condition attached to this consent:

Drawings Nos: 7730\_PL 001, 7730\_PL 002, 7730\_PL 003, 7730\_PL 004, 7730\_PL013, 7730\_PL 014, 7730\_PL 015, 40116\_LP(90)002 Rev A, 40116\_LP(90)004 Rev B, 40116\_LP(90)005 Rev B, 40116\_LP(90)008, 40116\_LP(90)009, 40116\_LP(90)010 Rev A, 40116\_LP(90)011 Rev A, CD V\_C7915 C22 Rev RO, CD V\_C7915 C23 Rev RO, CD V\_C7915 C24 Rev RO, AL (90) 140 Rev G, 4449\_201 Rev P1, 5023353\_RCF\_I\_RC4 Rev P3 dated 22 October 2012; Drawing No: 3168 / 20 dated 1 February 2013; and Drawing Nos: 7730\_PL 005 Rev A, 7730\_PL 007 Rev A, 7730\_PL 008 Rev A, 7730\_PL 009 Rev A, 7730\_PL 010 Rev A, 7730\_PL 011 Rev A, 7730\_PL 012 Rev A, 40116-LP(90)001 Rev E, 40116\_LP(90)003 Rev C, 40116\_LP(90)006 Rev C, W110033/A/B/06 Rev A, W110033/A/B/05 Rev A dated 18 February 2013.

Reason: To ensure compliance with the approved plans and clearly define the scope of the permission.

It is therefore considered the substantive reason for the objection is resolved.

**Recommendation:** No change required.

**Representor No : Talbot Green Developments Limited**

**Comments**

**Discretionary Relief**

On behalf of our client, Talbot Green Developments Limited (TGDL), these representations provide comments and precedents set in regard to the approach to discretionary relief in relation to Exceptional Circumstances (Regulation 55-58). Our client wishes to object to application of the Charging Schedule to developments which have been permitted but which require subsequent amendment, and to paragraph 6.3 of the Draft Charging Schedule (June 2013) in particular, which states that “The Council does not propose to offer discretionary relief”.

Our comments seek to ensure that Rhonda Cynon Taff County Borough Council (RCTCBC) pay due regard to the need to ensure that the combined weight of obligations do not render development in the Borough unviable on the application of the Community Infrastructure comparable to the scale of the Talbot Green town centre, which have very significant on-site infrastructure requirements. The viability modelling fails to account for consented schemes which become subject to ‘fresh’ planning applications (e.g. for revisions to layout) after the adoption of CIL, triggering the need for a payment. Such payments could result in ‘double dipping’ payment in the instance where an existing s106 Agreement has already secured relevant Strategic Infrastructure (or contributions towards), or could result in combined obligations. We raise concern that major developments could be rendered unviable due to the combined impact of s106 payments and CIL. In the context of economic uncertainty there is a need to have a discretionary relief policy to ensure chargeable development remains viable development.

In our opinion, the extent of previously delivered and future obligations should be considered when assessing the viability of a scheme, and in determining eligibility for Exemption Circumstance from CIL in accordance with the CIL regulations at the current time. At the time of making these representations TGDL have received, as joint applicants with Sainsbury’s Supermarkets Limited (SSL), a resolution to grant full planning permission for a 10,801sqm (GEA) supermarket. TGDL have also received a separate resolution to grant an overlapping outline planning permission for a new town centre comprising c.25,000sqm of Class A1 and A3 floorspace, including the above mentioned supermarket. The resolutions to grant were made to subject to Planning Obligations under s106 of the Act ensuring payment of (inter alia) £2.05M for strategic highway infrastructure, described in the committee reports as improvements to the roundabout junction of the A4119/A473. One of the transport projects included on the Councils Regulation 123 Draft Infrastructure List relates to the improvement of the A4119/A473 roundabout. The trigger point for making this payment results in the full amount being paid within 6 weeks of the full or outline development having commenced. The stated intention set out in the applications was, and remains, to implement the

supermarket as phase 1 of the wider town centre development. The development programme requires the provision, by TGDL, of significant new access infrastructure to serve the phase 1 site as well as provision of a serviced plateau for the supermarket itself. The provision of these site preparation/access works are envisaged to take approximately 12 months, after which construction of the supermarket by SSL will commence. Accordingly, the £2.05M strategic highway s106 payment will have been made some 11 months prior to construction of the supermarket commencing.

Retailing is a particularly dynamic sector of the economy with constant data analysis refining the ultimate end product. Accordingly, schemes such as those subject to the resolutions to approve, above, are frequently refined to ensure developments are fully cognisant of the latest thinking and tenant demands. It is possible, or even likely, therefore that the precise form of development will differ from that which has been resolved to be approved, potentially necessitating a further planning submission.

In Wales, there is no scope to submit a Minor Material or Non Material Amendment and accordingly the only options to seek approval for any change would be to either (a) seek to vary a condition listing the approved plans or (b) apply for a new full or outline planning permission. Unfortunately, the conditions set out in the committee report contain no condition listing the approved plans and while we have requested one be added, it is not clear at time of writing whether such a request will be granted. In such circumstances it appears that a new application would be required for even a relatively minor and acceptable change to the approved development.

While the Community Infrastructure Levy (Amendment) Regulations 2012, which came into effect on 28 November 2012, introduced a recognition that applications made under s73 of the Act might hitherto have resulted in an overpayment of CIL, there is no similar provision for new applications for full planning permission (under s57), even if such an application were materially similar to a previously approved permission and resulted in no increase in floorspace (indeed, even if they resulted in a reduction in floorspace).

The outcome of the above is that:

- Should development of the site preparation/access works commence, thus triggering payment of the £2.05 highway infrastructure payment (for works to the A4119/A473 junction, which is included on the Councils Regulation 123 list); and
- Should the permitted development need to be altered in any material way such that a new planning application is required; and
- Should such an application be determined after CIL comes into effect (as seems entirely possible given the current development programme and published timetable for introducing CIL);

Then, notwithstanding the fact that the development's share of its Regulation 123 infrastructure burden (£2.05M) will already have been paid and notwithstanding any implications for scheme viability, a further CIL payment would be required. This would be grossly unfair and would in effect constitute 'double dipping'. Furthermore, if a significantly different form of development were envisaged for phase 2 of the town centre scheme no account would appear to be able to be taken of the fact that the project would have already contributed over £2M towards infrastructure appearing on the Regulation 123 list. Again, this would be grossly unfair, would in effect constitute 'double dipping' and would have significant implications for scheme viability. It is also the case that another

element of infrastructure on the Regulation 123 draft list is a necessary part of the phase 2 town centre development, namely the signalisation of the A473/Glamorgan Retail Park roundabout. This is currently a conditional requirement of the phase 2 town centre development and is likely to be a conditional requirement of any subsequent alteration to phase 2, should such alteration be necessary. As such, as currently drafted, the charging schedule and infrastructure list would appear to require this to be both paid for and provided.

**Accordingly, our client wishes to object to the apparent potential application of the Charging Schedule to development which may already have been implemented but which require subsequent amendment.**

Regulations 55 to 58 allow charging authorities to set discretionary relief for exceptional circumstances to allow the charging authority to avoid rendering sites with specific and exceptional cost burdens unviable should exceptional circumstances arise. We believe that the above scenario constitutes exceptional circumstances. Before granting discretionary relief, the charging authority will need to be satisfied that the costs relating to the section 106 agreement (which we assume must include the section 106 agreement relating to the original permission) are greater than those related to the Community Infrastructure Levy, and that the relief would not constitute notifiable State Aid. We believe these stipulations would be met.

**Accordingly, our client wishes to object to paragraph 6.3 of the Draft Charging Schedule (June 2013), which states that “The Council does not propose to offer discretionary relief”.**

In a similar set of circumstances to those outlined above, the London Borough of Brent and Quintain Estates and Development plc prepared and signed a Statement of Common Ground on 12th November 2012. The statement formalised areas of agreement in relation to the CIL Draft Charging Schedule between the two parties to address the circumstances prior to the adoption of the CIL Charging Schedule. As with the Talbot Green development, the s106 agreement pre-dated the Charging Schedule coming into effect and accordingly included infrastructure to both directly mitigate on site impacts, and to serve the wider needs of the area.

We request that a Statement of Common Ground or Memorandum of Understanding is also prepared and signed in advance of examination to assist the Examiner in addressing the concerns outlined above. In these similar circumstances, we wish to address our client's unease and to avoid 'double dipping' for Strategic Infrastructure and to ensure certainty for developers in assessing viability in regard to progressing their schemes.

#### **Council's Response**

The condition suggested by the objector has been attached to the relevant consent. Condition 2 of the planning permission is as follows:

The development hereby approved shall be carried out in accordance with the following approved plans, unless otherwise to be approved and superseded by details required by any other condition attached to this consent:

Drawings Nos: 7730\_PL 001, 7730\_PL 002, 7730\_PL 003, 7730\_PL 004,

7730\_PL013, 7730\_PL 014, 7730\_PL 015, 40116\_LP(90)002 Rev A, 40116\_LP(90)004 Rev B, 40116\_LP(90)005 Rev B, 40116\_LP(90)008, 40116\_LP(90)009, 40116\_LP(90)010 Rev A, 40116\_LP(90)011 Rev A, CD V\_C7915 C22 Rev RO, CD V\_C7915 C23 Rev RO, CD V\_C7915 C24 Rev RO, AL (90) 140 Rev G, 4449\_201 Rev P1, 5023353\_RCF\_I\_RC4 Rev P3 dated 22 October 2012; Drawing No: 3168 / 20 dated 1 February 2013; and Drawing Nos: 7730\_PL 005 Rev A, 7730\_PL 007 Rev A, 7730\_PL 008 Rev A, 7730\_PL 009 Rev A, 7730\_PL 010 Rev A, 7730\_PL 011 Rev A, 7730\_PL 012 Rev A, 40116-LP(90)001 Rev E, 40116\_LP(90)003 Rev C, 40116\_LP(90)006 Rev C, W110033/A/B/06 Rev A, W110033/A/B/05 Rev A dated 18 February 2013.

Reason: To ensure compliance with the approved plans and clearly define the scope of the permission.

It is therefore considered the substantive reason for the objection is resolved.

**Recommendation:** No change required.

**Representor No : The Coal Authority**

**Comments**

Thank you for your letter dated 24<sup>th</sup> June 2013 regarding the latest policy related consultations.

Having reviewed the consultation documents, I confirm that The Coal Authority has no comments to make in relation to the CIL Draft Charging Schedule.

**Council's Response**

Comment noted.

**Recommendation:** No change required.

**Representor No : Dwr Cymru Welsh Water**

**Comments**

Thank you for allowing Dwr Cymru Welsh Water (DCWW) the opportunity to formally respond to the above consultation.

With regards this consultation, due regard should be given to our previous representations in relation to your LDP and Preliminary Draft Charging Schedule consultation on the 11th January 2013 and your Council's subsequent response issued in April 2013.

The provision of improved utility services identified in the 'Social Infrastructure' list (paragraph 3.5 of the *Infrastructure Assessment Background Paper – Revised March 2013*) is supported and we agree that drainage, sewerage and water management infrastructure is required to meet the needs of new development and support growth.

We note that your Authority proposes to use the revenue raised through the CIL process to fund improvements in highway and education capacity in the County Borough. However, we believe that there may be instances where in order to bring forward a development ahead of our regulatory investment then alternative funding would be required. Whilst we acknowledge that funding for the water and sewerage infrastructure required to deliver the LDP can be obtained from DCWW's own Asset Management Plan (AMP) programme, if there are any problems with our infrastructure, for which we have not secured investment from our Regulator to resolve, then CIL funding can assist with a shortfall.

Turning to the process of Regulatory funding, DCWW submits its business plan every five years to Ofwat, the Water Industry Regulator, for approval of its next AMP. This is a lengthy process whereby a water company's plans are subject to scrutiny and challenge by other key stakeholders before the Final Determination is announced. The end result is that our Plan has to be affordable to customers as it is customers' annual charges that primarily fund our Capital Investment.

Therefore, there is always disparity in the timeframes between the LDP and a water company's AMP, which is regulated on a 5 yearly cycle. Equally so, as our Plan has to be affordable, therefore there may be circumstances whereby funding shortfall may occur. We can provide an example of this circumstance that could relate to your Local Authority:

In terms of strategic assets in your Authority area, our Cynon Waste Water Treatment Works currently has limited headroom and that improvement works will be required to accommodate all of the allocated growth within your LDP. These works are currently being considered in our next AMP submission to our regulator, Ofwat, which is currently being drafted and will be submitted on the 2nd December 2013. We will not know the extent of our investment until our Final Determination in December 2014 and only then will we be able to identify whether any shortfall in funding, if any, exist. In these circumstances, developers are expected to contribute towards this shortfall.

We note that your Authority has published a list that demonstrates where a funding gap to deliver infrastructure identified in the LDP exists as well as its Regulation 123 Infrastructure list for infrastructure which it considers is likely to apply to CIL monies. Whilst we currently have no infrastructure projects included on these lists at this time we believe that where development will create a need for extra facilities, in advance of our Regulatory investment, it may be reasonable for developers to meet or contribute towards the cost of providing such facilities. We understand that the Regulation 123 Infrastructure list can be updated and note that there may be occasions where we would identify a funding gap and submit a water or sewerage infrastructure scheme to you to add to the list, which would be subject to the required consultation. The funding received would be purely for any funding shortfall to accommodate growth.

We would welcome being involved at future stages of developing a Charging Schedule for the Authority and in any further alterations to the Planning Obligations SPG.

**Council's Response**

The comments regarding the regulatory funding process and the timescales involved are noted. It is agreed that in principle CIL could be used to fund the provision of water and sewerage infrastructure. The Council will be able to amend and update its Regulation 123 list (following appropriate consultation) at any time. The Council will continue to monitor the LDP and the delivery of sites and will consider what action is necessary to support the delivery of its allocated sites. This consideration will include the delivery of utility infrastructure required to serve a site.

Presently it is the Council's intention that the revenue raised through the CIL process will be used to fund improvement projects for transportation and education in the County Borough. The Council does not intend to use CIL to fund the delivery of utility infrastructure at this time.

The provision of improvements to the strategic water and drainage network will continue to be negotiated on a site by site basis and secured through Planning Obligations. The Council is in the process of revising the adopted Planning Obligations SPG. As part of this process further consideration will be given to the issues raised by the Welsh Water.

**Recommendation:** No change required.

**Representor No : CPL Industries Ltd**

**Comments**

These representations are made with specific reference to the landholdings of CPL Industries Ltd at the former Cwm Colliery and Phurnacite site Abercynon, both of which are strategic development plan allocations.

The Cwm cokeworks site is located in the highest tariff area and whilst in principle greenfield sites close to the motorway may be able to deliver the required sums, the application of the proposed CIL charge will render the site unviable and undevelopable. There are a range of unique issues to address on site, including extensive contamination, tip reprofiling, site remediation and addressing the listed cooling towers. Discussions have been ongoing with the authority for a considerable period on the current planning application and a key block to that scheme being presented to committee is the fact that at present the s106 requirements being sought would render the development unviable. Having applied the proposed CIL charges to the scheme, this would result in additional costs of up to £6.5 million and therefore mean that the site would not come forward for redevelopment. This is not in accord with development plan objectives or the wide range of local support for the site to be regenerated.

In respect of the Phurnacite site, the draft charging schedule sets a zero tariff for the area and no further comments are made. In summary, the Draft Charging Schedule should recognise the unique circumstances of the Cwm Coke works site and exempt it from CIL requirements in order to be able to ensure that it can be regenerated in the future.

**Council's Response**

The Cwm Colliery site is allocated in the Adopted LDP as a strategic site. Unlike the other strategic sites in Zone 3, the site has a number of unique development issues.

Whilst no viability evidence has been provided in support of the representation, the Council recognises the importance of this site to the delivery of its LDP objectives. The Council has undertaken additional viability assessment looking specifically at the impact of CIL on this and other strategic sites in the County Borough. (See Appendix 11).

Using the assumptions in the original viability study, an appraisal was undertaken for the Cwm Colliery site. The findings of the assessment indicate that the site could support a residential CIL charge of £164 per square metre. A CIL charge of £100 would therefore represent a viability buffer of 40% to allow for abnormal and other costs that will arise in the development of this site.

In setting its CIL rate, the Council has to strike a balance between funding the infrastructure necessary to support the delivery of the proposals in the LDP and ensuring that new development comes forward over the life of the Plan (2006-2021). Based on the viability evidence presented by a number of representors, the Council has decided to reduce the CIL charge in Zone 3 from £100 per square metre to £85.

Based on the aforementioned viability appraisal for the Cwm Colliery site, a charge of £85 would represent an almost 50% viability buffer.

For clarity it should be noted that the Draft Infrastructure List proposes that CIL will be used to fund the provision of a new primary school on the site. Previous discussions have centred on the provision of a school via a planning obligation but this is no longer the case.

The Council is entitled to review its position on offering exceptional circumstances relief at any time. Regulations 55 to 58 allow councils to set discretionary relief for exceptional circumstances. At the present time, the Council is minded not to offer relief. It will continue to keep this position under review.

The comments in respect of the Phurnacite Strategic Site are noted.

**Recommendation:** Amend Residential CIL Charge for Zone 3 to £85 per square metre.

**Representor No : Rhondda Housing Association**

**Comments**

Since the adoption of the LDP and its current policies it has been very difficult to achieve 20% affordable housing on nearly all s106 sites in RCT, the introduction of the CIL charges will add to the difficulties in delivering affordable housing in RCT. The proposed CIL rate is set too high and is likely to exacerbate this (The DV suggested between £25-£125 per square meter for residential proposals in the higher viability zone, the proposed charging schedule has opted for £100 – a value at the higher end of the scale). This

proposed CIL rate of £100 per square meter is higher than the City of London proposed rate (£95 per m<sup>2</sup> for much of the city). As mentioned it is currently very Difficult to deliver affordable housing in the current climate with diminishing levels of SHG alone, and we are heavily reliant on the planning system as a mechanism to deliver the much needed affordable housing in RCT, but these proposed rates could sterilise this as a vehicle to deliver affordable housing.

### **Council's Response**

Given the fixed nature of CIL compared to the negotiable affordable housing contribution, the RSLs concern is understood and the Council is keen to ensure that in setting its CIL rates it does not undermine the important delivery of affordable housing across the County Borough.

Based on the findings of the AMR, the Council secured 77 new affordable homes in 2012-13. Since 2006 the total number of affordable houses built is 430. The average affordable housing percentage achieved on sites in Zone 2 and Zone 3 since the adoption of the LDP is 15%. The delivery of affordable housing remains one of the Council's key priorities and the Council has sought to secure as high a level of affordable housing as possible during the tough economic conditions.

In undertaking its viability assessment, the District Valuer took account of the affordable housing targets in the LDP (20% and 10% respectively) and site appraisals included the relevant affordable housing percentage. On the basis of these appraisals, the Council is confident that the proposed CIL rates will allow the affordable housing targets to be met.

On the basis of the original viability study and the additional viability testing undertaken following the draft CIL consultation, the Council is of the view that the level of CIL proposed in the Draft Schedule of a £100 charge in Zone 3 and £40 in Zone 2 are robust and supported by evidence. The appraisals make allowance for significant viability buffers to meet unknown costs and/or insignificant percentage differences assumed against different costs in different methodologies.

However, in setting its CIL rate, the Council has to strike a balance between funding the infrastructure necessary to support the delivery of the proposals in the LDP and ensuring that new development comes forward over the life of the Plan. It also has to consider the potential impact of CIL on the delivery of affordable housing. In order to ensure that the delivery of affordable housing is supported, it is recommended that the CIL rate in Zone 3 be reduced to £85. The rate in Zone 2 will remain unchanged.

**Recommendation:** Amend Residential CIL Charge for Zone 3 to £85 per square metre.

**Representor No : Newydd Housing Association**

### **Comments**

We would like to firstly state that we recognise the benefits that the Community Infrastructure Levy (CIL) will bring through strategic infrastructure projects to regenerate areas and encourage further development opportunities. It is also positive as referenced

in para 3.4 that 15% of CIL revenue per annum raised in a community or town council area is proposed to be reinvested in that area for community infrastructure projects including the possibility for this to include affordable housing.

However, our fundamental concern on the proposals centres on whether the principles of CIL will curtail the amount of affordable housing that will be delivered through Section 106 Agreements. Currently, the system allows for the ability for a planning applicant to test planning obligations and their impact on a financial appraisal before a formal consent is issued. The CIL proposals and levy are non-negotiable which removes this flexibility and negotiation. Furthermore, in ensuring that the CIL levy is met first and foremost, there may not be any tolerance in a developer's financial appraisal to meet any further planning gain such as that of affordable housing. In limiting the amount of affordable housing being delivered through Section 106 Agreements, this will ultimately exacerbate housing need given the limits of the social housing grant budget.

We also note that CIL will be levied on any conversions of buildings no longer in lawful use resulting in a new dwelling - para 4.1. It will be important to ensure that this does not encroach into the realms of Empty Homes and limit their ability to be brought back into a beneficial use.

The Council is required to monitor CIL on an annual basis. The Council will use this process (in conjunction with the LDP Annual Monitoring Report) to determine whether or not the level and nature of the CIL charge is having a detrimental impact upon the delivery of affordable housing.

### **Council's Response**

Given the fixed nature of CIL compared to the negotiable affordable housing contribution, the RSLs concern is understood and the Council is keen to ensure that in setting its CIL rates it does not undermine the important delivery of affordable housing across the County Borough.

Based on the findings of the AMR, the Council secured 77 new affordable homes in 2012-13. Since 2006 the total number of affordable houses built is 430. The average affordable housing percentage achieved on sites in Zone 2 and Zone 3 since the adoption of the LDP is 15%. The delivery of affordable housing remains one of the Council's key priorities and the Council has sought to secure as high a level of affordable housing as possible during the tough economic conditions.

In undertaking its viability assessment, the District Valuer took account of the affordable housing targets in the LDP (20% and 10% respectively) and site appraisals included the relevant affordable housing percentage. On the basis of these appraisals, the Council is confident that the proposed CIL rates will allow the affordable housing targets to be met.

On the basis of the original viability study and the additional viability testing undertaken following the draft CIL consultation, the Council is of the view that the level of CIL proposed in the Draft Schedule of a £100 charge in Zone 3 and £40 in Zone 2 are robust and supported by evidence. The appraisals make allowance for significant viability buffers to meet unknown costs and/or insignificant percentage differences assumed against different costs in different methodologies.

However, in setting its CIL rate, the Council has to strike a balance between funding the infrastructure necessary to support the delivery of the proposals in the LDP and ensuring that new development comes forward over the life of the Plan. It also has to consider the potential impact of CIL on the delivery of affordable housing. In order to ensure that the delivery of affordable housing is supported, it is recommended that the CIL rate in Zone 3 be reduced to £85. The rate in Zone 2 will remain unchanged.

**Recommendation:** Amend Residential CIL Charge for Zone 3 to £85 per square metre.

**Representor No : Welsh Government (Economy, Science and Transport)**

**Comments**

No comment to make on the proposed Community Infrastructure Levy and Draft Charging Schedule.

**Council's Response:**

Comments noted.

**Recommendation:** No change required.

**Representor No : Caerphilly CBC**

**Comments:**

Caerphilly CBC supports the content of the draft charging schedule and the evidence base that informs it.

**Council's Response:**

Comments noted.

**Recommendation:** No change required.

**Representor No : The Theatres Trust**

**Comments**

Thank you for confirming in the Report of Responses that theatres will not be charged for CIL. However, the Draft document does not contain as much information as the Preliminary document. For instance, the Preliminary document showed an example of a CIL charge for pubs in Table 4 on page 13 which is A4 Use Class, but this Use Class does not appear in Table 1 of charges in the Draft document. Paragraph 4.4 of the Draft

document advises that A1, A3 and only D1 Primary Healthcare will be charged – no other use within D1. There is no statement of a nil charge for any other Use Classes or infrastructure types.

#### **Council's Response**

The Council does not propose to levy a charge on theatres and does not believe it is necessary to state all those uses to which CIL will not apply in its Charging Schedule.

**Recommendation:** No change required.

#### **Representor No : Country Landowners Association**

#### **Comments**

I am in receipt of your June 2013 Draft Charging Schedule, I am dismayed to see that the points I raised in my previous email to you have not been addressed in any way.

I fail to see why at least no mention has been given to the specific TAN 6 policy, other than in para 6.2 that there is relief offered for affordable housing. TAN 6, in itself has an affordable element, I would at least like to have seen specific mention of this in your statement. I am clearly not convinced that by being silent on this subject, Officers will be aware of the affordable element and any such property will be subjected to the normal charge for residential development in the zone it is situated in.

I reiterate the issue over a blanket policy for charging for business use where a major retail outlet will be charged the same rate as a newly constructed farm shop!

From a conversation with Ms. Gulley she did mention the possibility of an exemptions policy to allow for possible anomalies to the norm, however I note on page 12, section 6, this is very limited. I appreciate RCT is not necessarily a rural Authority, but there are a number of rural enterprises in the Authority area which will be penalised by the proposed CIL rules. With diversification projects, the rural businesses may well be in a position to employ extra staff to service these needs in the future, however, with the blanket imposition of the CIL policy this may well jeopardise any future developments of this nature.

I would be very grateful for you to once again look into the points raised above, I very much hope you are able to take these points on board.

#### **Council's Response**

##### **Rural enterprise dwellings**

Rural enterprise dwellings are specifically intended to provide accommodation for individuals primarily employed in land related businesses which, directly or indirectly, need to be located in the countryside rather than in existing settlements. Provision is subject to strict assessment and control.

Rural enterprise dwellings are specifically provided by individual business to cater for their own needs. The dwellings are privately owned and do not fall within the established

definition of affordable housing.

The Regulations require that decisions in respect of which types of development should pay CIL and the rate at which it should be charged, should be based solely on the viability evidence. The evidence base that underpins the Council's CIL process clearly demonstrates that new build private market housing is viable in Zones 2 and 3 of the study area. On this basis the Council in operating a CIL must levy a charge against privately owned rural enterprise dwellings.

The Council is required to monitor CIL on an annual basis. The Council will use this process (in conjunction with the LDP Annual Monitoring Report) to determine whether the level and nature of the CIL charge is having a detrimental impact upon the delivery of rural enterprise dwellings.

### **Farm Shops**

No viability evidence has been submitted to demonstrate that charging CIL against farm shops would be unviable.

The Use Classes Order defines farm shops as Class A1 General Retail. As explained above, the evidence base that underpins the Council's CIL process clearly demonstrates that Class A1 retail development is viable across the study area. On this basis the Council in charging CIL must levy a charge against new build farm shops in excess of 100sqm. It should be noted that CIL will not apply to the conversion of existing buildings from agriculture to a farm shop or the development of a new building with a floorspace of less than 100sqm.

**Recommendation:** No change required.

### **Representor No : Meadbro Investments**

#### **Comments**

I have been running a successful business in the RCT area for over 30 years.

I have seen big business receive very large grants and then leave the valley. Businesses like mine (whilst employing less people) have survived and still trading.

I do not know much about C.I.L. However it appears to me to be a levy on building new property. The only people building in the valley on any scale these days are the Housing associations. Do you really want the Valley to just be this way ????

The more that it will cost to build in the valley, it will therefore follow that the fewer private developments there will be as houses have an upper limit. I really feel you should bear this in mind.

Thank you in advance for your co operation in this matter.

#### **Council's Response**

The Council recognises that the economic downturn has significantly impacted upon growth locally, regionally and nationally. In the development of its CIL, the Council has sought to strike a balance between supporting growth across the County Borough and funding the infrastructure upon which new development will rely.

Based on the economic viability study prepared by the District Valuer, the Council believes it has struck an appropriate balance both in terms of rates and charging zones.

The Council's proposed CIL rate in the Rhondda and Cynon valleys for new residential development is £0. Whilst this rate is based solely on viability assessment rather than any policy considerations, it will potentially serve to improve the attractiveness of developing in the northern valleys and stimulate more house building.

The Council is required to monitor CIL on an annual basis. The Council will use this process (in conjunction with the LDP Annual Monitoring Report) to determine whether or not the level and nature of the CIL charge is having a detrimental impact upon the delivery of new housing across the County Borough.

**Recommendation:** No change required.

**Representor No : Cynon Taf Community Housing Group**

**Comments**

On behalf of Cynon Taf Community Housing Group, I would like to express our significant concerns about the proposed rates set out in the draft Charging Schedule within Rhondda Cynon Taff's *Community Infrastructure Levy* (CIL).

If the proposed rates are, then we predict there being an impact on the delivery of affordable housing, particularly in the southern area of the Borough where the levy charge is the highest. We feel that the residential rates are set too high and that, as there is no scope for negotiations on the levels in the scheme viability process, affordable housing will be the first element to be omitted from any proposed scheme. We are aware that the private house building sector has expressed similar concerns and have emphasised the point that affordable housing cannot be delivered along with other developer obligations under CIL.

If the Local Authority loses the ability to secure affordable housing through the planning system, then the only other way to meet the long term housing need highlighted in the Housing Market Assessment is to provide affordable housing through a decreasing social housing grant programme. In our opinion, this will impact on the availability of RCT to achieve its objectives of better housing and increasing economic activity as contained in the Single Integrated Plan. We therefore urge the Local Authority to reconsider its proposals.

**Council's Response**

Given the fixed nature of CIL compared to the negotiable affordable housing contribution, the RSLs concern is understood and the Council is keen to ensure that in setting its CIL rates it does not undermine the important delivery of affordable housing across the

County Borough.

Based on the findings of the AMR, the Council secured 77 new affordable homes in 2012-13. Since 2006 the total number of affordable houses built is 430. The average affordable housing percentage achieved on sites in Zone 2 and Zone 3 since the adoption of the LDP is 15%. The delivery of affordable housing remains one of the Council's key priorities and the Council has sought to secure as high a level of affordable housing as possible during the tough economic conditions.

In undertaking its viability assessment, the District Valuer took account of the affordable housing targets in the LDP (20% and 10% respectively) and site appraisals included the relevant affordable housing percentage. On the basis of these appraisals, the Council is confident that the proposed CIL rates will allow the affordable housing targets to be met.

On the basis of the original viability study and the additional viability testing undertaken following the draft CIL consultation, the Council is of the view that the level of CIL proposed in the Draft Schedule of a £100 charge in Zone 3 and £40 in Zone 2 are robust and supported by evidence. The appraisals make allowance for significant viability buffers to meet unknown costs and/or insignificant percentage differences assumed against different costs in different methodologies.

However, in setting its CIL rate, the Council has to strike a balance between funding the infrastructure necessary to support the delivery of the proposals in the LDP and ensuring that new development comes forward over the life of the Plan. It also has to consider the potential impact of CIL on the delivery of affordable housing. In order to ensure that the delivery of affordable housing is supported, it is recommended that the CIL rate in Zone 3 be reduced to £85. The rate in Zone 2 will remain unchanged.

**Recommendation:** Amend Residential CIL Charge for Zone 3 to £85 per square metre.

**Representor No : Hendre**

**Comments**

I am writing on behalf of Hendre Limited (which includes Haford Housing Association Limited and Haford Care Association Limited) in respect of the Draft Community Infrastructure Levy (CIL) proposed Charging Schedule.

As Registered Social Landlords (RSL's) operation within Rhondda Cynon Taf County Borough Council we welcome the opportunity to present our observations in respect of the CIL and particularly the proposed Charging Schedule.

Given the primary function of the Hendre Group members is to provide Affordable Housing (and also that they are Charitable organisations) we accept that we receive concessions that we will not be directly affected by the proposed charging mechanism contained within the CIL for types of development we regularly undertake. We also appreciate the certainty that a Charging Schedule brings to developers in identifying 'up front' non-negotiations contributions contributions that are required (or not required) to be

made for a scheme in a prescribed area (or zone) of the Authority.

However, given the reduction in the Social Housing Grant (SHG) capital programme within Wales over recent years, every opportunity should be made to encourage the delivery of Affordable Housing through other mechanisms, including the planning system.

It is felt that by leaving the requirement for Affordable Housing as an element that is open to negotiation, it will be very difficult to predict and programme for the amount of affordable housing that will be provided outside the main Social Housing Grant programme.

The measure of viability of a development site is also very subjective with the delivery of Affordable Housing being the only element dependent upon the case that a developer may choose to make for a given site.

At present, even with the use of existing section 106 mechanism which places a requirement of the provision of 20% Affordable Housing on residential development sites, the Authority has struggled to attain this target and therefore have been left with a shortfall of provision against that predicted.

Whilst the CIL residential rate of zero in Zone 1 is welcomed it is felt that the rates in Zone 2 and 3 at £40 and £100 respectively are too high and would thereby reduce or even preclude the delivery of Affordable Housing in the areas of the Authority where the need for Affordable Housing is greatest and a rate more reflective of the mid-point recommended within Schedule 1 of the 'Study into the economic viability of charging community infrastructure levy in Caerphilly, Merthyr & Rhondda Cynon Taf Councils' prepared by District Valuer Services, would be more appropriate.

I would also like to highlight any recovery mechanisms to be employed by the Authority on larger strategic sites if the parameters on which the original viability were based were to change significantly between any agreement to decrease or forego any Affordable Housing and the completion of the development. For example where expected abnormal costs may not have actually materialised, or the market may have increased over a review period to such an extent that would have enabled the provision of Affordable Housing to have been increased.

### **Council's Response**

Given the fixed nature of CIL compared to the negotiable affordable housing contribution, the RSLs concern is understood and the Council is keen to ensure that in setting its CIL rates it does not undermine the important delivery of affordable housing across the County Borough.

Based on the findings of the AMR, the Council secured 77 new affordable homes in 2012-13. Since 2006 the total number of affordable houses built is 430. The average affordable housing percentage achieved on sites in Zone 2 and Zone 3 since the adoption of the LDP is 15%. The delivery of affordable housing remains one of the Council's key priorities and the Council has sought to secure as high a level of affordable housing as possible during the tough economic conditions.

In undertaking its viability assessment, the District Valuer took account of the affordable

housing targets in the LDP (20% and 10% respectively) and site appraisals included the relevant affordable housing percentage. On the basis of these appraisals, the Council is confident that the proposed CIL rates will allow the affordable housing targets to be met.

On the basis of the original viability study and the additional viability testing undertaken following the draft CIL consultation, the Council is of the view that the level of CIL proposed in the Draft Schedule of a £100 charge in Zone 3 and £40 in Zone 2 are robust and supported by evidence. The appraisals make allowance for significant viability buffers to meet unknown costs and/or insignificant percentage differences assumed against different costs in different methodologies.

However, in setting its CIL rate, the Council has to strike a balance between funding the infrastructure necessary to support the delivery of the proposals in the LDP and ensuring that new development comes forward over the life of the Plan. It also has to consider the potential impact of CIL on the delivery of affordable housing. In order to ensure that the delivery of affordable housing is supported, it is recommended that the CIL rate in Zone 3 be reduced to £85. The rate in Zone 2 will remain unchanged.

**Recommendation:** Amend Residential CIL Charge for Zone 3 to £85 per square metre.

**Representor No : McCarthy & Stone Retirement Lifestyles LTD**

#### **Comments**

As the market leader in the provision of retirement housing for sale to the elderly, McCarthy and Stone Retirement Lifestyles Ltd considers that with its extensive experience in providing development of this nature it is well placed to provide informed comments on the emerging Rhondda Cynon Taf County Borough Council Community Infrastructure Levy (CIL), insofar as it affects or relates to housing for the elderly.

We previously provided commentary on the Preliminary Draft Charging Schedule in January 2013 in which we expressed our concern that the emerging CIL could prohibit the development of specialist accommodation for the elderly at a time when there is an existing and urgent need for this form of development. For your convenience we have provided a copy of our initial response. Notably we raised concerns as to how specialist accommodation for the elderly differs from general needs housing through key issues including, amongst other things, communal floorspace built to a higher specification, a slower sales rate and higher empty property costs. On this basis we respectfully requested that a specific development scenario for sheltered accommodation be carried out for this form of development.

It must be noted that, despite the above, a separate development scenario for specialist accommodation for the elderly has not been conducted and this form of development has still been amalgamated into a general residential levy rate.

The Council has produced a Report of Comments and Responses to the Preliminary Draft Charging Schedule. This Council's gleaned five key points from our representation (Representor Number: 6019) and responded to them accordingly. For the remainder of

this letter we will critique the Council's responses, where appropriate:

**a) *The CIL rate for residential should differentiate between different types of accommodation;***

The basis of the Council's rationale for not independently assessing the viability of specialist viability of the elderly is based on an erroneous interpretation of the CIL regulations, namely that *'The Regulations do not differentiate between different types of residential accommodation'*. This is incorrect.

The CIL Guidance stresses the importance of individual market sectors that play an important role in meeting housing need, housing supply and the delivery of the Development Plan, such as specialist accommodation for the elderly. This is relevant in the context of Paragraph 37 of the Guidance:

*"... However, resulting charging schedules should not impact disproportionately on particular sectors or specialist forms of development and charging authorities should consider views of developers at an early stage".*

It is clear therefore that Charging Authorities are not limited to setting differential CIL rates based on classifications of the Town and Country Planning Use Classes Order. Indeed there are a number of examples of Council's proposing CIL rates on different forms of development within the C3 Use Class. We would like to draw the Council's attention to the recent Examiner's Report for the Central Lancashire CIL in which a nil levy rate for flatted residential development was recommended by the Examiner. This is independent of a higher rate for housing on the grounds that flatted development is less viable. As the Council is no doubt aware, both flats and houses are different forms of C3 residential accommodation.

There is an increasing consensus that specialist accommodation for the elderly should not be viewed as an oversight or 'casualty' of the CIL regime. The Retirement Housing Group (RHG), a consortium of retirement housing developers and managers from the private sector and housing associations, recently commissioned the consultants Three Dragons to produce a paper that provides evidence and guidance for viability practitioners in appraising sheltered / retirement and extra care accommodation. This paper was sent to every viability practitioner in the UK with a copy sent to the Planning Minister, Nick Boles – a copy of this paper has also been attached for your convenience.

The Planning Minister responded positively to the RHG's paper with a letter sending out a message to charging authorities that they should differentiate between retirement housing and general needs homes where viability is an issue. The letter states *"... The revised Guidance published in December 2012 is clear that "charging schedules should not impact disproportionately on particular sectors or specialist forms of development and charging authorities should consider views of developers at an early stage" (page 121, paragraph 37). The guidance does not specify that any form of housing should be treated any differently to other sectors but is clear that if you have any evidence that your development would be made unviable by the proposed levy charge, this should be considered by the Authority and the examiner..."*. A copy of the Minister's letter is provided for your convenience.

***b) The Economic Viability Study does not provide a development scenario for the delivery of sheltered housing;***

The Council's response to this point is fundamentally based on the misinterpretation of the CIL Regulations as detailed in point a). There are however two comments of note IN THE Council's response which I would like to address.

*To date no private market developments that provide exclusively for the provision of sheltered accommodation for the elderly have been developed in Rhondda Cynon Taf.*

A lack of private retirement developments in Rhondda Cynon Taf is in itself an indicator that development of this type is already on the margins of viability in the Borough. Subjecting this form of development to levy rates proposed will simply ensure this form of development is not forthcoming.

*The Council considers that the inclusion of this type of accommodation as part of the consideration of the viability of residential development would not have been representative of the market and likely to produce inaccurate viability data.*

It is agreed that the inclusion of specialist accommodation for the elderly would not be representative of the wider residential market – this is the basis of our request for the Council to independently assess the viability of this form of development.

***c) The build and finance costs identified in the study do not reflect the costs of building elderly persons accommodation;***

It is appreciated that there is little data for specialist accommodation for the elderly as '*To date no private market developments that provide exclusively for the provision of sheltered accommodation for the elderly have been developed in Rhondda Cynon Taf.*' While we accept that this presents some difficulties there is now a considerable amount of guidance available for charging authorities and viability practitioners to address this issue competently and quickly

McCarthy & Stone Retirement Lifestyles Ltd and Churchill Retirement Living Ltd, the two largest providers of specialist housing for the elderly, have produced a joint position paper providing a number of recommendations on testing the viability of specialist accommodation for the elderly for CIL and how it differs from conventional housing. This was sent to every local planning authority in England and Wales, including the Rhondda Cynon Taf County Borough Council.

Additionally the Retirement Housing Group (RHG) paper, which we previously mentioned in point b), produced a paper that provides evidence and guidance for viability practitioners in appraising sheltered / retirement and extra care accommodation. This paper was sent to every viability practitioner in the UK. Copies of both these papers have been attached for your convenience.

***d) The Economic Viability Study does not allow for realistic levels of developer profit, and***

In the foreseeable economic climate we consider that the minimum anticipated developer

profit required to achieve financial backing for a retirement scheme to proceed would be 20% of Gross Development Value (GDV). The proposed Charging Schedule works on the basis of an assumed profit of 17.5% of GDV. Developer returns assumed on this basis would not provide sufficient incentive for developers of specialist accommodation for the elderly to take on the risk of return.

It is important for the Council not to 'over-egg' the robustness of the housing market within the Borough as any proposed CIL rate should still be viable. I would like to draw the Council's attention to the Examiner's Report for the Greater Norwich Development Partnerships CIL in which the Examiner concluded that the Council has undertaken an over-simplistic approach to finance and cash flow considerations with low profit margins specifically cited (paragraph 24.). As a result the Council's CIL rate for residential development was reduced by 35%.

### **Summary**

To conclude, we reiterate that given the extent of projected housing need for older person's accommodation it is paramount that the Rhondda Cynon Taf County Borough Council's CIL schedule recognises the potential shortcomings of providing a uniform CIL rate for all forms of residential development. The additional costs associated with the construction and initial maintenance of this form of development, coupled with the slower sales rate, make it clear that the financial viability of such developments are more finely balanced than those of general needs houses and apartments. We once again request that the Council conduct a separate development scenario for specialist accommodation for the elderly in line with our recommendations.

We would also like to add that many aspects of the Viability Assessment are of concern and do not accord with recent examples of 'best practice' and contradict the conclusions of recent Examiner's reports. It has been made abundantly clear recently that it is of vital importance for Charging Authorities not to over-estimate the strength of the housing market and, similarly, not to underplay costs to developers. On this basis we would respectfully suggest that the Council re-evaluate some of the guidance given in the Viability Assessment.

Should the Council require any additional information in relation to any of the above, McCarthy and Stone remain willing offer their assistance to the Council.

Additional Information provided:

- A copy of McCarthy & Stone Retirement Lifestyle Ltd representation (January 2013)
- A briefing note on viability prepared for the Retirement Group by Three Dragons (may 2013)
- Letter from Nick Boles MP to the Retirement Housing Group (June 2013)
- Briefing Note - Retirement Housing and the Community Infrastructure Levy

### **Council's Response**

The Council recognises the importance of and supports all types of housing provision, including the provision of specialist housing for the aging population.

Following the receipt of the McCarthy and Stone objection and the viability information submitted by them in support of their representations, the Council undertook additional viability appraisals looking specifically at specialist retirement apartment developments. (See Appendix 11).

The viability appraisals were undertaken in Zones 2 and Zones 3. The appraisals were run using the following assumptions:-

- Unit sizes - 49 square metres (NIA) for the 1 bed flats and 65 square metres (NIA) for the 2 bed flats- as per McCarthy and Stone's typical standard unit size ranges.
- Affordable content - 20%.
- Build costs - as per BCIS.
- External works - 10% as per McCarthy and Stone's representation.
- NIA to GIA conversion- the 30% adjustment as indicated in the McCarthy & Stone representation.
- Sales - based on scheme specific evidence (McCarthy and Stone have active sites in Cardiff and Porthcawl).
- Ground rents - based on scheme specific evidence.
- Service charge and empty property costs – based on a finance mid-point average all-in annual cost for service charges (developer foots shortfall until scheme fully sold out), electricity and Council tax.
- Development period – based on McCarthy & Stone's 1 unit per month.
- Development profit – based on 20% on GDV (4.76% on affordable).
- Marketing costs – based on 3.5% for marketing plus 1.5% sales; affordable housing at 0.5% for sales. Legals all at £600 per unit, as per McCarthy and Stone.
- Interest costs- McCarthy and Stone suggest 7% debit rate (with no credit rate). Given these investments are potentially more risky and with far less opportunity for off-set borrowing, the appraisal has assumed a 7.0% debit rate and a nominal 2.0% credit rate.
- Developer contingency – based on 2.5%.
- Professional fees- based on 10%.
- S106 – none assumed. Any costs to be covered by viability buffer as per main study.

Based on these additional appraisals, the findings indicate that specialist retirement apartment developments can afford to meet the residential CIL charges in Zones 2 and 3. The viability of these developments is such that at the rates proposed, there is a viability buffer of 40 to 50%.

The Council is therefore confident that the proposed CIL rates will not undermine the delivery of specialist retirement apartment developments in the County Borough and there is no justification for amending the proposed Charging Schedule.

**Recommendation:** No change required.

**Representor No : HBF Consortium**

**Comments**

**1.0 Introduction**

1.1 This Representation has been prepared by Savills in conjunction with HBF on behalf of a landowner and developer consortium comprising:

- Llanmoor Homes
- Persimmon Homes/Charles Church
- Redrow Homes
- Taylor Wimpey

Hereafter known as 'the Consortium'.

1.2 The Consortium represents a significant proportion of the residential developers present in the Borough.

1.3 This representation has been submitted to influence the emerging Community Infrastructure Levy (CIL) Charging Schedule and Infrastructure List proposed by Rhondda Cynon Taff County Borough Council (the Council). The representation is made in respect of the Draft Charging Schedule placed for public consultation in the period 27 June to 7 August 2013.

1.4 The Consortium has significant land interests across the Borough, all of which will contribute to the maintenance and delivery of the housing land supply (to meet identified housing needs). The rate of CIL and proposed implementation/operation is therefore of critical importance to the Consortium.

1.5 In setting the rate of CIL, Regulation 14(1) of the 2010 Community Infrastructure Levy, England and Wales Regulations (as amended) (No. 948) states that "***an appropriate balance***" needs to be struck between "***a) the desirability of funding from CIL (in whole or in part)***" against "***b) the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development***". There is a clear requirement to ensure that **most** developments are able to proceed. The Government provides further guidance on the meaning of the appropriate balance from paragraph 7 of the Community Infrastructure Levy Guidance – Charge Setting & Charging Schedule Procedures (March 2010).

1.6 The Consortium therefore considers that it is imperative that the evidence supporting CIL provides an up to date, consistent and well informed evidence base of economic viability in order to test various scenarios against CIL rates.

## **2.0 Draft Regulation 123 List of Infrastructure**

2.1 The Consortium welcomes the clarity in respect of the draft infrastructure list and the relationship with S106 developer contributions, although we note the ability for the list to be changed at the discretion of the Council.

2.2 The draft infrastructure list highlights the lack of infrastructure funding via CIL in the north of the County and we therefore seek clarity from the Council as to how this infrastructure will be funded in this part of the Borough in order to stimulate development. If this is to continue to be recovered through S106 obligations, this will place additional burden on the delivery of housing in the north of the Borough,

an area which is already recognised by the DVS viability assessment to have low levels of viability and one which comprises 4 of the 8 strategic sites identified in the LDP for housing delivery.

- We understand that education and strategic highway contributions will not be levied through S106 in the Southern Areas of the Borough but other contributions and obligations will be sought which are directly related to the development, such as public open space provision and commuted sums, local highway improvements, environmental and biodiversity mitigation. As a result, it is evident that S106 obligations will continue to be recovered in addition to CIL, and therefore, sufficient allowances for additional S106 obligations should be made within the viability assessment.

### 3.0 Charging Zones

3.1 As part of our submission to the Preliminary Draft Charging Schedule, we raised concern in relation to the inclusion of the area of Tonyrefail within Zone 3, stating that market conditions in this location are much more aligned with those in Zone 2 and therefore this area should be re-zoned.

3.2 Subsequent to our submission, further sales price evidence for Tonyrefail was produced to the Council as justification. This information has now been updated and is attached at **Appendix 1**.

3.3 The information provided at Appendix 1 is based upon the three most recent development sites at Tonyrefail as follows:-

3.4 **Redrow @ Dan Y Bryn** – The development achieved a range of sale prices which averaged £164 per sq ft and an overall sales rate of 2 per month. Redrow needed to agree part exchange on 46% of these sales in order to maintain this sales rate. The average prices above take no account of the cost involved in administering the part exchange deals or of any discounts agreed on the sale of the part exchange properties and this has an impact on the net price achieved. In addition, many regional and local developers are unable to offer or administer part exchange deals of this volume.

**Davies Homes @ Nant Y Fron** - Recent phase of 14 x 2 and 3 bedroom homes. 4 sales were achieved in 2012, 7 sales to date during 2013 with a further 3 still available. Achieved prices equate to £130 and £159 psf with an average achieved price of £146 per sq ft. The sales rate reflects less than 1 unit a month and the developer reports that these sales values and rates would be totally unsustainable on a stand alone site basis.

3.5 **Llanmoor @ Padfield Court** - Llanmoor first released houses for sale on this site in September 2012 with the show home opened on 2 March 2013. To date they have sold just 4 units, with an average sales price of £161 psf, again at a sales rate of 1 unit per month.

3.6 These sales values are lower than what is being achieved in the southern part

of Zone 3 which is demonstrated by the sales values being achieved at Llanmoor Homes Cefn Cadno development at Llanharan where average sales prices are achieving £173 per sq ft and which are demonstrated at **Appendix 2**. We are also advised by Redrow Homes that sales values on their Woodland Meadow site in Llanharan are averaging just over £170 per sq ft.

3.7 Sales prices align more closely (and are in fact lower than) those within Zone 2. At present, there is only one active volume development selling in Zone 2, that being Barratt's College Green site where sales values are averaging £165 per sq ft as demonstrated at **Appendix 3**.

3.8 Just as important is the sluggish rate of sale witnessed in Tonyrefail when compared to average sales rates in Zone 2 and 3 which has a detrimental impact on development cashflow and the Zones should therefore be amended to reflect this by including Tonyrefail in Zone 2.

3.9 Within our test appraisals for Zone 2 referred to at Section 4, we have adopted average sales values of £165 per sq ft and a rate of sale of 2 per month than that demonstrated above. This is in line with what is being achieved in Zone 2 but is slightly higher than that being achieved in Tonyrefail.

#### **4.0 Viability Assessment**

4.1 This document does not intend to re-state many of the comments made in our earlier consultation response. However, subsequent to our submission, further dialogue has been held with the Council and additional justification provided to them. As a result, the comments made below reflect the Consortium's current position in respect of the viability review that has been undertaken to justify the rates of CIL proposed.

4.2 In summary, our concern remains that in undertaking viability analysis to inform CIL rates, DVS has failed to capture the true costs of development within the South Wales Valleys and has also failed to provide the Consortium with the evidence they have relied upon in undertaking their assessment. Whilst we accept that the exercise must be theoretical to a degree, it must also be founded on reality. In South Wales, the Consortiums experience is that every site of sufficient volume has an element of costs that are usually considered 'abnormal' but in fact, due to the frequency of occurrence, to consider them as 'abnormal' is not a true reflection, and not to allow for costs of this nature within a Borough wide viability review places a significant risk on delivery.

4.3 Our comments in relation to the specific inputs into the viability review are set out below:

4.4 Benchmark Land Value – We have considered the basis of arriving at a benchmark land value having reviewed the actual price paid for a number of development sites within each Zone as set out in the table below:

Site	Zone	Net Acres	Date	Purchase Price	£ per net acre
Milford Park, Rhydfelin	2	3.38	Feb 13	£2,217,000	£655,917
Alexon, Hawthorn	2	4.5	Nov 12	£2,055,000	£456,667
Parc Dan Y Bryn, Tonyrefail	?	3.72	Jan 11	£850,000	£228,495
Padfield Court, Tonyrefail	?	10.96	Aug 11	£3,710,000	£338,504
Bryn Celyn, Llanharan	3	7.1	Feb 12	£2,051,312	£288,917
Woodland Meadow, Llanharan	3	7.43	2012	£1,870,000	£251,682

4.5 The Zone 3 sites are both Greenfield. The purchase price for the Woodland Meadow scheme was recently determined at arbitration and we consider this to represent the benchmark land value for Greenfield land in Zone 3. We have applied £250,000 per net acre within our appraisals but consider that Brownfield land values would be at least 40% higher than the Greenfield equivalent.

4.6 At Tonyrefail, Parc Dan Y Bryn is a Greenfield site, whereas Padfield Court is a Brownfield site. The value of the Brownfield site is approximately 40% higher than the Greenfield site, and we consider the achieved prices represent the benchmark land values within Tonyrefail, particularly given that the S106 agreement at Padfield Court was agreed following a viability review.

4.7 The two sites in Zone 2 are both Brownfield sites and reflect the position of the seller in both cases. The prices achieved are higher than what we would consider as benchmark land values for Brownfield land, but consider that the market is similar to that at Tonyrefail and have therefore applied a benchmark land value for Greenfield land at £225,000 per net acre.

4.8 Acquisition Costs – The costs associated with site acquisition should be allowed for within the appraisal. Our test appraisals allow 4% stamp duty, 1% agent's fee and 0.5% legal fees which are reasonable market allowances and on an overall basis accord with the DVS review.

4.9 Sales Values – Within Zone 2 (including Tonyrefail), new homes product is

- achieving net sales value averaging between £160 - £165 per sq ft. Sales evidence for Tonyrefail is attached at Appendix 1 and for Rhydfelin (Zone 2) at Appendix 3. This is higher than DVS has allowed for within their viability review.
- 4.10 Within Zone 3, new homes product is achieving net sales value averaging £170 - £175 per sq ft. This is at the top end of the range adopted by DVS. Sales evidence for Zone 3 is attached at Appendix 2. Within our appraisals we have adopted £165 (Zone 2 and Tonyrefail) and £175 per sq ft (Zone 3).
- 4.11 A 6% deduction in Gross Development Value has a significant impact upon scheme viability and as a result, we consider this justifies the need for a zoned CIL charge.
- 4.12 Build Costs & Infrastructure – We agree with the principle of estimating the base build cost from the RICS Build Cost Information Service after adjusting for location, which at the time of submission equates to £70 per sq ft. This is in line with average plot cost and preliminaries experienced by the Consortium.
- 4.13 In addition, DVS apply an additional 17.5% of base build cost to account for external and additional sustainability costs. External works only account for on site roads, services and drainage. We have undertaken further analysis to establish external costs of actual developments within the Borough and the details of these are schedule at **Appendix 4**. These costs relate to costs associated with the 6 developments set out in the schedule at 4.2 above, which we estimate represents over 80% of the private residential development currently active in the Borough.
- 4.14 Our assessment provides a schedule of total 'site costs' for actual delivery of each site which range between 25 and 35% of base build cost which is significantly higher than the 17.5% allowance made by DVS within their assessment which we trust sufficiently demonstrates the extent of **typical** development costs associated with sites within the Borough, and that the allowances within the DVS are insufficient to cover typical development costs.
- 4.15 It must also be noted that two of the sites within our analysis are Greenfield, Bryn Celyn and Woodland Meadow, and on both, significant site costs were encountered, demonstrating that these costs are common on both Brownfield and Greenfield sites.
- 4.16 These cost levels accord with the Homes and Communities Agency analysis completed by BCIS for the Housing Corporation in 2007, which indicated that the average cost of external works and infrastructure on residential schemes started since 2003 was equivalent to an additional 27% of building costs, including a wide range of site specific circumstances. In addition, the viability analysis undertaken by GVA for Torfaen Council in respect of the South Sebastopol development further supports this position.
- 4.17 We consider it appropriate therefore to make allowances of at least 27% of base build costs within the viability appraisal to cater for typical "external" development costs encountered within the Borough. This is not at the upper

range of our evidence, but is the average.

- 4.18 Building Regulation Improvements and Fire Sprinklers – The Minister for Housing and Regeneration has recently announced the introduction, through amendments to Part L of Building Regulations, a requirement to reduce greenhouse gas emissions by 8% from 2010 levels. This is lower than the anticipated 40% originally consulted upon and is therefore unlikely to have any additional cost impact.
- 4.19 In the same announcement, the Minister also confirmed that fire sprinklers will need to be installed in all new and converted houses and flats from January 2016, and as a result, the viability review should include the average cost of £3,075 per dwelling as arrived at within the Welsh Government's own study into this matter. It is appreciated that the CIL levy is likely to come into force prior to January 2016. However, given the confirmation from the Housing Minister, developers will need to factor these costs into their land buying assumptions and will therefore impact on scheme viability, earlier than January 2016.
- 4.20 Contingency – We consider it appropriate to apply a contingency of 3% on base build costs (equivalent of 2% of total costs excluding land purchase).
- 4.21 Section 106 obligations – The draft infrastructure list limits the use of CIL for a number of educational and transportation projects. As a result, the likelihood of each development needing to make further financial contributions under a S106 agreement is high.
- 4.22 The average S106 obligation for the 6 sites referred too previously amounted to just over £2,870 per dwelling. Whilst it is acknowledged that going forward CIL will cater for some of these obligations, we consider it appropriate that the viability assessment make allowance for S106 contributions and we have allowed £1,000 per dwelling within our appraisal.
- 4.23 Professional Costs – We have made an allowance of 8% which we understand is similar to the allowance within the DVS viability review.
- 4.24 Sales & Marketing Costs – Residential development of the scale envisaged will require the provision of marketing suites, show homes, on site sales staff and high profile marketing campaigns. As a result, we have made an allowance of 3% of GDV for marketing. We have not allowed for external estate agency costs as this is not normally the case in South Wales with larger development sites. We have allowed £750 per unit for market housing legal fees and £500 per unit for affordable units.
- 4.25 Finance – Based on the current funding market, a debit finance rate of 7% which accounts for both entry and exit fees is reasonable. An allowance of 6% as per the DVS viability review is lower than we would expect. The DVS also apply a credit rate of 5.2% which we do not consider appropriate and is not something that we have seen other advisors apply on CIL reviews for other local authorities across the UK where a debit rate of 7% has been commonly applied.

- 4.26 Developer Profit – DVS assume a developer return of 17.5% of GDV for the private housing and 4.76% on GDV of the affordable housing. These rates are lower than the returns required by the vast majority of developers, and, as importantly, their funding partners are able to accept. It is also below the accepted developer's profit of 20% in a recent appeal decision (APP/X0360/A/12/2179141).
- 4.27 A return of 17.5% takes no account of the developer's overheads and a more realistic developer profit on market sales, taking account of the prevailing market conditions and development risks is a minimum of 20% and 6% for the affordable housing element. This is consistent with the rate of profit adopted by advisors acting on behalf of other local authorities in England where CIL has been adopted and implemented including Broadland, Brent and Fareham to name just a few.
- 4.28 In order to demonstrate the impact that the proposed CIL levy will have on development, we have set out two sample appraisals for each Zone, one of 50 dwellings and another for 100 dwellings. Zone 2 appraisals (to include Tonyrefail) are attached at **Appendix 5** and the Zone 3 appraisals attached at **Appendix 6**.
- 4.29 Our appraisals make the following allowances which based on the comments herein we consider to be reasonable assumptions in the context of development across South Wales.
1. **Sales Values** - £165psf (Zone 2) and £175psf (Zone 3)
  2. **Affordable** – Nil Grant (42% ACG)
  3. **Densities** – 14 units per acre/14,600 sq ft per acre
  4. **Sales Rates** – 2 units per month
  5. **Benchmark Land Values** - £225,000 (Zone2) and £250,000 (Zone 3) per net acre
  6. **Build Costs** – BCIS (£70psf)
  7. **Contingency** – 3% of base build cost
  8. **External Costs** – 27% of base build costs (amounts to £275,000 per acre)
  9. **Fire Sprinklers** - £3,075 per plot
  10. **Developers Profit** – 20% of GDV (Market Housing) & 6% (Affordable) – 19.2% Average
  11. **Purchasers Costs** – 5.5% (Stamp Duty, Agents & Legals)
  12. **Professional Costs** – 8% of cost
  13. **Sales & Marketing Costs** – 3.5% of GDV
  14. **Finance Debit Rate** – 7%
  15. **S106 costs** - £1,000 per dwelling
- 4.30 Given CIL's nature as a fixed tariff, it is important that the Council selects rates that are not on the limit of viability. Consequently, sensitive CIL rate setting for residential schemes is vital. The guidance advises that CIL rates should not be set at the very margin of viability, partly in order that they may remain robust over time as circumstances change: *'Charging authorities should avoid setting a charge right up to the margin of economic viability across the vast majority of sites in their area... In setting a CIL rate, [they] will need to bear in mind that economic circumstances and land values could change significantly during the lifetime of the charging schedule.'*

## 5.0 Viability Conclusions

### Zone 2

- 5.1 Based on the two appraisals, the residual for CIL amounts to £14 - £16.50 per sq m. However, this makes no allowance for a viability buffer. It must be remembered that our appraisals are based on Greenfield land values and no allowance adopted for Brownfield values. In addition, the total site costs adopted within our appraisals are average costs and as a result, there is a risk of them being higher in site specific circumstances. A viability buffer is therefore important to ensure that the majority of allocated development is capable of being delivered.
- 5.2 We would therefore recommend that the CIL levy for Zone 2, which is to include Tonyrefail should be set no higher than £11.50 per sq m which allows a 30% viability buffer. When added to the S106 allowance within the appraisal, the total amount of CIL levy and S106 obligation amounts to £23.37 per sq m or £1,850 - £1,970 per dwelling. The average S106 obligation for the Zone 2 and Tonyrefail schemes referred to in the table at Section 4.2 of this report amount to £19.41 per sq m or £1,879 per dwelling. A CIL charge of £40 as proposed by the Council will represent an average increase of 130% on the current S106 obligation for these schemes to £4,300 per dwelling.

### Zone 3

- 5.3 Based on the two appraisals, the residual for CIL amounts to £60 - £65 per sq m. However, this makes no allowance for a viability buffer. It must be remembered that our appraisals are based on Greenfield land values and no allowance adopted for Brownfield values. In addition, the total site costs adopted within our appraisals are average costs and as a result, there is a risk of them being higher in site specific circumstances. A viability buffer is therefore important to ensure that the majority of allocated development is capable of being delivered.
- 5.4 We would therefore recommend that the CIL levy for Zone 3, should be set no higher than £45 per sq m which allows a 30% viability buffer. When added to the S106 allowance within the appraisal, the total amount of CIL levy and S106 obligation amounts to £57.37 per sq m or £4,570 - £4,830 per dwelling. The average S106 obligation for the Zone 3 schemes referred to in the table at Section 4.2 of this report amount to £47.65 per sq m or £4,560 per dwelling. A CIL charge of £100 as proposed by the Council will represent an average increase of 110% of the current S106 obligation for these schemes to £9,400 per dwelling.

- Appendix 1** – Details of house sales in Tonyrefail  
**Appendix 2** – Details of house sales in Llanharan  
**Appendix 3** - Details of house sales in Rhydfelin  
**Appendix 4** – External / actual development costs  
**Appendix 5** – Zone 2 Appraisals  
**Appendix 6** – Zone 3 Appraisals

## **Council Response**

There are three primary issues:

1. Expanding Zone 2 to include the Tonyrefail area;
2. Viability appraisal methodology & setting the CIL Rates; and
3. Strategic Sites.

### **1. Expanding Zone 2 to include the Tonyrefail area**

On the basis of the additional viability evidence submitted by the Housing Consortium and the Council's desire to support the delivery of new housing, it is recommended that Zone 2 should be enlarged to include the Tonyrefail area.

The Council will keep under review both the CIL rates and CIL zones and if on account of viability evidence it is considered that the Tonyrefail area could support a higher charge, it is in the Council's control to review its CIL.

### **2. Viability appraisal methodology & setting the CIL rates**

Following the Draft Charging Schedule Consultation, the Council undertook a range of supplementary viability testing to further test its position. (See Appendix 11).

#### **Like for Like Viability Testing**

The representation and additional viability evidence presented by the Housing Consortium was critical of the study methodology. Rather than debate the merits of different viability models and the different assumptions they make, the Council was keen to understand the results of Housing Consortium viability testing against its own.

In order to understand how the viability methodology used by Housing Consortium differed from the original Viability Study and what effect different assumptions had on setting the CIL rates, the Council undertook like for like testing using the Housing Consortium methodology.

Additional viability testing was undertaken on the basis of the Housing Consortium methodology excluding only those allowances with which the Council fundamentally disagreed (for example the cost of sprinklers). This extra testing highlights the areas of disagreement and the effect of these items on viability and CIL. The additional viability testing was undertaken as follows:-

<b>Assumption</b>	<b>Additional Appraisal Used Housing Consortium figures?</b>	<b>Difference</b>
Housing Market	<b>Yes</b>	
Benchmark Land Values	<b>Yes</b>	
Fees and Stamp Duty Land Tax on fixed land price and residual amount	<b>Yes</b>	
Construction Costs	<b>Yes</b>	
Other Professional Fees	<b>Yes</b>	
Marketing & Disposal Fees	<b>Yes</b>	
Finance	<b>Yes</b>	
Development Profit	<b>Yes</b>	.
External Allowances	No	Housing Consortium apply a cost allowance of 27%.  The testing applied 20%.
Fire Sprinklers	No	Housing Consortium apply a cost of £3,075 per dwelling.  The Council does not agree with this approach.
Section 106	No	Housing Consortium apply a cost of £1,000 per dwelling.  The Council does not agree with this approach.

The Housing Consortium is of the view that a 30% viability buffer should be applied when setting the CIL rates. Having run their viability appraisals in accordance with the methodology outlined in their response and having applied a 30% viability buffer, they recommend the following rates:

	<b>CIL Rate with 30% Buffer</b>
<b>Zone 2</b>	£11.50 per square metre
<b>Zone 3</b>	£45 per square metre

The Council ran additional appraisals based on the Housing Consortium methodology

excluding only those assumptions which were fundamentally disagreed with. These fundamental disagreements relate to:

- 7% difference in external allowances;
- the inclusion of the cost of sprinklers;
- the inclusion of a general section 106 cost

Using the Housing Consortium assumptions (except the 3 bullet points listed above) and having applied a 30% viability buffer, the DV concluded that the CIL rates using this methodology would be set at:-

	<b>CIL Rate with 30% Buffer</b>
<b>Zone 2</b>	£55 per square metre
<b>Zone 3</b>	£85 per square metre

### **Comment on areas of disagreement**

**External Allowances** – The Housing Consortium suggest a cost allowance of 27%. The Council remains of the view that 17.5% is supported by both the Three Dragons guidance (which has recommended external allowances of 15%) and other scheme specific viability evidence. Some development sites allowances are moving towards 20% (and beyond in exceptional cases) as additional requirements such as drainage attenuation become more prevalent and onerous. To reflect this, the additional appraisals were run using a 20% allowance.

It is noted that the Housing Consortium table (Appendix 4) on external allowances is helpful, even though it represents a small sample of selected sites. This table shows that the divergence between external works (with a range of between 3.22% and 18.26% and an average of 11.25%) and abnormal costs (which when added increases the range to 25 to 35% and with an average of 30.61%). In terms of pure external works the assumed allowance of 17.5% in the original Study is high and it is only when other factors (e.g. abnormal costs) are included that the rate appears to the lower end of the scale. The difficulty is therefore what costs are regular enough to be considered "normal" and therefore to be included in the external allowance.

The Council acknowledges that some future development sites will be affected by abnormal costs. In establishing the methodology for the assessments RCTCBC, MTCBC and CCBC, along with the DV, concluded that it was not possible to establish and implement differential CIL rates for sites without abnormal costs and sites with abnormal costs. This is primarily due to the fact that abnormal costs are just that, abnormal, and can vary greatly in nature, scale and cost.

Given the potential variance of such costs it would be inappropriate to viability test sites using an assumed cost, because this could result in over-burdening sites with the highest levels of abnormal costs, whilst under charging sites with little or no abnormal costs, both situations being inequitable. Consequently it would be inappropriate to include abnormal costs in the Viability Report methodology and it is the council's view that such costs should be considered on a site-by-site basis.

**Fire Sprinklers** - In his announcement confirming that there would be a phased

introduction of fire sprinklers – with the regulations applying to high risk properties such as care homes from April 2014 and new and converted dwellings from January 2016 – the Minister for Housing and Regeneration stated that the phasing was intended to ‘allow the house building industry to gain experience and skills, and [give] the sector the opportunity to innovate and reduce the costs of installing sprinklers’ and that as a result of the phased approach it ‘will mean savings for the house building industry as compared to our original consultation proposals’.

Given this change in the Welsh Government’s position and their view that there will be savings on the costs given in the original consultation proposals, it is considered there is no basis for including a cost of £3,075 per dwelling. If the costs efficiencies are not achieved at the eventual date of policy implementation, the Council will have further contingency in the form of the viability buffer applied and the programmed future CIL monitoring and review points.

**General Section 106 Cost** - In undertaking the site appraisals the three authorities took a strategic decision not to make an assumption in respect of S106. This decision was taken for the following reasons:

1. Only a minority of planning applications in Rhondda Cynon Taf are subject of S106 contributions. As a result the vast majority of planning applications are unaffected by S106 costs. Therefore applying a cost assumption for S106 would mean applying a cost element to this vast majority of developments, which would not incur such costs. Doing so would undermine the ability to raise CIL revenue intended to provide infrastructure to support development in accordance with the Development Plan, a prime objective of the implementation of CIL.
2. The Rhondda Cynon Taf Planning Obligations Register (2013) illustrates that the main elements of infrastructure secured through S106 process relate to education capacity improvements; affordable housing; strategic and local transport improvements; public open space and ecological mitigation. The Council proposes to use CIL revenue to fund educational and strategic transportation projects. These elements will therefore no longer be funded through S106 agreements. The Economic Viability Study took into account the requirements of the Council’s affordable housing policy when assessing sites. The only elements that have not been considered relate to site specific issues such as access and highways; public open space and ecological mitigation. Evidence contained in the Rhondda Cynon Taf Planning Obligations Register (2013) demonstrates that these requirements are not financially onerous and will only impact on a small number of applications. By their nature, they are also bespoke and difficult to cost in general terms.

## Conclusion

The CIL rates were set on the basis of the original viability study and using a 20% viability buffer in Zone 3 and a 30% viability buffer in Zone 2.

On the basis of the additional appraisals, it is considered that the original Zone 2 and 3 rates remain viable. These rates also make allowance for significant viability buffers to meet unknown costs and/or insignificant percentage differences in individual assumed

costs.

Ultimately it is house builders who will deliver new housing in the County Borough and the Council has sought to understand their approach to viability and how CIL should be set. It is accepted that each development scheme is different and there is no single, definitive viability model for every eventuality.

The Council has therefore tested viability again using all the Housing Consortium assumptions except in relation to:

- external costs
- costs for sprinklers
- section 106 costs

For the reasons outlined above, the Council does not agree that a County Borough wide CIL, that will apply to all developments, should be set on the basis of assumed abnormal and section 106 costs which are by definition difficult to assume and sprinkler costs which may or may not apply until 2016. The unknown costs for externals/abnormals; sprinklers and s106 are better accounted for through the application of a viability buffer.

It is helpful to identify the differences between the Council's position and that of Housing Consortium. It will be for the CIL Examiner to consider how these differences should be accounted for in setting the CIL rates. It is hoped that they will share the Council's view that they are best dealt with through the application of a viability buffer.

Notwithstanding the view that the £100 and £40 rates remain viable, the Council has further considered its approach to setting CIL in light of the viability evidence submitted by the Housing Consortium (and others in relation to affordable housing and strategic sites). It is considered that the approach taken to setting CIL in Zone 2 and the use of a 30% viability buffer is also appropriate in Zone 3.

Applying a 30% rather than a 20% viability buffer in Zone 3 will reduce the rate at which CIL is set and will mean the Council is effectively taking a more cautious approach when striking a balance between funding infrastructure and encouraging new development. It is considered such an approach is the correct one at this time and will better support the delivery of new housing.

	<b>DVS Suggested Range of CIL Charge</b>	<b>Viability Buffer</b>	<b>CIL Rate</b>
<b>Zone 2</b>	£10 to £60	30%	£40
<b>Zone 3</b>	£25 to £125	30%	£87.5

The application of a 30% viability buffer would produce a CIL charge in Zone 3 similar to that arrived at using the Housing Consortium methodology (with external costs at 20% rather than 27% & no costs assumed for sprinklers or section 106) of £85.

It is therefore recommended that the CIL rate for Zone 3 be reduced to £85. The Council will keep under review both the CIL rates and CIL zones and if on account of viability evidence it is considered they should change, it is in the Council's control to review its

CIL.

### 3. Strategic Sites

The Council has undertaken additional viability assessments looking specifically at the impact of CIL on this and other strategic sites in Zone 3. Of the 8 strategic sites in the County Borough, 5 are in Zone 1, none are in Zone 2 (as proposed to be amended) and 3 are in Zone 3.

Using the assumptions in the original viability study:

- for the Cwm Colliery site, the findings of the assessment indicate that the site could support a residential CIL charge of £164 per square metre. A CIL charge of £100 would therefore represent a viability buffer of 40% to allow for abnormal and other costs that will arise in the development of this site. A charge of £85 would represent a 50% viability buffer.
- for the Mwyndy strategic site, the findings of the assessment indicate that the site could support a residential CIL charge of £151 per square metre. A CIL charge of £100 would therefore represent a viability buffer of 35% to allow for abnormal and other costs that will arise in the development of this site. A charge of £85 would represent a 45% viability buffer.
- for the Llanilid strategic site the findings of the assessment indicate that the site could support a residential CIL charge of £114 per square metre. A CIL charge of £100 would therefore represent a viability buffer of 12.5% to allow for abnormal and other costs that will arise in the development of this site. A charge of £85 would represent a 25% viability buffer.

In setting its CIL rate, the Council has to strike a balance between funding the infrastructure necessary to support the delivery of the proposals in the LDP and ensuring that new development comes forward over the life of the Plan (2006-2021). Based on the viability evidence presented by a number of representors, the Council has decided to reduce the CIL charge in Zone 3 from £100 per square metre to £85.

**Recommendation:** Amend Residential CIL Charge for Zone 3 to £85 per square metre.

Expand Residential CIL Charge Zone 2 to include the Tonyrefail area.

**Representor No : Network Rail**

#### Comments

Network Rail has been consulted by Rhondda Cynon Taf County Borough Council on the Community Infrastructure Levy (CIL) Draft Charging Schedule and Supplementary Planning Guidance Consultation. Thank you for providing us with this opportunity to comment on this document.

Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns, operates,

maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail's infrastructure. In this regard, please find our comments below.

### **Developer Contributions**

The Community Infrastructure Levy (CIL) Draft Charging Schedule and Supplementary Planning Guidance document should set a strategic context requiring developer contributions towards rail infrastructure where growth areas or significant housing allocations are identified close to existing rail infrastructure.

Many stations and routes are already operating close to capacity and a significant increase in patronage may create the need for upgrades to the existing infrastructure including improved signalling, passing loops, car parking, improved access arrangements or platform extensions.

As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements.

Specifically, we request that a Policy is included within the document which requires developers to fund any qualitative improvements required in relation to existing facilities and infrastructure as a direct result of increased patronage resulting from new development.

The likely impact and level of improvements required will be specific to each station and each development meaning standard charges and formulae may not be appropriate. Therefore in order to fully assess the potential impacts, and the level of developer contribution required, it is essential that where a Transport Assessment is submitted in support of a planning application that this quantifies in detail the likely impact on the rail network.

To ensure that developer contributions can delivery appropriate improvements to the rail network we would recommend that Developer Contributions should include provisions for rail and should include the following:

- Network Rail believes that developments on the railway infrastructure should be exempt from CIL or that its development should at least be classified as payments in-kind.
- We would encourage the railways to be included on the Regulation 123 list of the types of infrastructure projects that will be funded through CIL.
- Network Rail would like to seek a clear definition of buildings in the draft charging schedule. Railway stations are open-ended gateways to railway infrastructure and should not be treated as buildings. Likewise lineside infrastructure used to operate the railway (such as sheds, depot buildings etc) should be classed as railway infrastructure and not treated as buildings for the purposes of the charging schedule.
- Network Rail would like confirmation that its developments over 100sqm

- undertaken using our Permitted Development Rights will not be CIL chargeable.
- We consider that imposing a charge on one infrastructure project to pay for another in an inefficient way of securing funding
- A requirement for development contributions to deliver improvements to the rail network where appropriate.
- A requirement for Transport Assessments to take cognisance of impacts to existing rail infrastructure to allow any necessary developer contributions towards rail to be calculated.
- A commitment to consult Network Rail where development may impact on the rail network and may require rail infrastructure improvements. In order to be reasonable these improvements would be restricted to a local level and would be necessary to make the development acceptable. We would not seek contributions towards major enhancement projects which are already programmed as part of Network Rail's remit.

### Level Crossings

Development proposals' affecting the safety of level crossings is an extremely important consideration for emerging planning policy to address. The impact from development can result in a significant increase in the vehicular and/or pedestrian traffic utilising a crossing which in turn impacts upon safety and service provision.

As a result of increased patronage, Network Rail could be forced to reduce train line speed in direct correlation to the increase in vehicular and pedestrian traffic using a crossing. This would have severe consequences for the timetabling of trains and would also effectively frustrate any future train service improvements. This would be in direct conflict with strategic and government aims of improving rail services.

In this regard, we would request that the potential impacts from development affecting Network Rail's level crossings, is specifically addressed through planning policy as there have been instances whereby Network Rail has not been consulted as statutory undertaker where a proposal has impacted on a level crossing.

As such, we strongly believe that the importance of Level Crossing safety warrants a specific Policy included in the Supplementary Planning Guidance Document which will help to elevate the importance of Level Crossings within the development management and planning process. We request that a policy is provided confirming that:

- The Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway:
  - *Schedule 4 (d)(ii) of the Town & Country Planning (Development Management Procedure) (Wales) order, 2012 requires that... "Where any proposed development is likely to result in a material increase in volume or a material change in the character of traffic using a level crossing over a railway (public footpath, public or private road) the Planning Authority's Highway Engineer must submit details to both The Welsh Ministers and Network Rail for separate approval".*

- As a first principle, Network Rail would seek to close Level Crossings where possible.
- Any planning application which may increase the level of pedestrian and/or vehicular usage at a level crossing should be supported by a full Transport Assessment assessing such impact: and
- The developer is required to fund any required qualitative improvements to the level crossing as a direct result of the development proposed.

We trust these comments will be considered in your preparation of the forthcoming policy document.

### **Council's Response**

The Council recognises the important role the rail network plays in meeting the transportation needs of the residents of Rhondda Cynon Taf. As a result a number of new stations and rail improvements have been identified in the Adopted Rhondda Cynon Taf LDP. These proposals have been included in the Infrastructure Assessment Background Paper (2012).

Whilst funding for new stations and rail improvements has not been included in the initial draft infrastructure list, consideration will be given their inclusion in future iterations of the list.

Taking the points raised by Network Rail in turn:-

**Network Rail believes that developments on the railway infrastructure should be exempt from CIL or that its development should at least be classified as payments in-kind.**

Under the Council's proposed charging schedule general railway related developments such as railway stations, offices, storage buildings and areas, rail yards, signalling or junction buildings would not be subject to CIL.

The decision in principle whether developments on the railway infrastructure should be exempt from CIL is a matter for national government.

In accordance with the Council's charging schedule, retail, residential, food and drink and primary healthcare developments would be eligible for CIL. No viability evidence has been submitted to demonstrate why CIL should not be charged against these uses if they are developed on railway infrastructure.

**We would encourage the railways to be included on the Regulation 123 list of the types of infrastructure projects that will be funded through CIL.**

Noted.

**Network Rail would like to seek a clear definition of buildings in the draft charging schedule. Railway stations are open-ended gateways to railway infrastructure and should not be treated as buildings. Likewise lineside infrastructure used to operate**

**the railway (such as sheds, depot buildings etc) should be classed as railway infrastructure and not treated as buildings for the purposes of the charging schedule.**

Under the Council's proposed charging schedule general railway related developments such as railway stations, offices, storage buildings and areas, rail yards, signalling or junction buildings would not be subject to CIL.

The definition of a building for the purpose of CIL is set out at paragraph 6 of the CIL Regulations (as amended).

**Network Rail would like confirmation that its developments over 100sqm undertaken using our Permitted Development Rights will not be CIL chargeable.**

Under the Council's proposed charging schedule general railway related developments such as railway stations, offices, storage buildings and areas, rail yards, signalling or junction buildings would not be subject to CIL.

In accordance with the CIL Regulations (as amended) developments over 100sqm undertaken using permitted development rights can be eligible for CIL.

**We consider that imposing a charge on one infrastructure project to pay for another in an inefficient way of securing funding.**

Noted.

**A requirement for development contributions to deliver improvements to the rail network where appropriate.**

Development contributions (both CIL and section 106) could be used in principle to improve the rail network.

**A requirement for Transport Assessments to take cognisance of impacts to existing rail infrastructure to allow any necessary developer contributions towards rail to be calculated.**

Noted.

**A commitment to consult Network Rail where development may impact on the rail network and may require rail infrastructure improvements. In order to be reasonable these improvements would be restricted to a local level and would be necessary to make the development acceptable. We would not seek contributions towards major enhancement projects which are already programmed as part of Network Rail's remit.**

Noted.

The comments regarding level crossings will be dealt with in the responses to the Planning Obligations SPG consultation report.

**Recommendation:** No change required.

**THE FOLLOWING WAS RECEIVED AFTER THE END OF THE CONSULTATION PERIOD AND IS A LATE REPRESENTATION.**

**Representor No : Cwm Taf Local Health Board**

**Comments**

The Health Board would like to re-emphasise our earlier submission, and in particular our view that the DV opinion regarding reduced land values is fundamentally flawed.

For your information, we have recently receive details of the valuation of a site in Oxford Street, Mountain Ash, which we have identified as a suitable site for a new primary care centre. The valuation, for a site of 0.6 acre is £325K, which not only makes the scheme financially unviable, but values this site at a higher level than sites in Cardiff.

There is currently a review of the Premises Directions underway, these are the guidelines for funding etc. We're not sure when the new Directions will be issued, although it is believed that this will be before the end of the financial year, and there has been no indication of what changes are being proposed. We believe that funding will remain basically the same, i.e. applications to WG, but no guarantees have been given.

**Council's Response**

The Council is supportive of the need to provide new, modern health care facilities to meet the needs of the residents of Rhondda Cynon Taf. In setting the CIL rate the Council is required to ensure that that decisions in respect of the land uses that should be subject to CIL and the level of the charge be based solely on the viability evidence.

The Economic Viability Study (2012) looks specifically at the issue of viability and viable uses in Rhondda Cynon Taf. The findings of the study clearly demonstrate that a charge can be levied in respect of Primary Healthcare provision in the County Borough. The Study suggests that a rate up to £125 per sqm could be levied against Primary Healthcare development without rendering development unviable. In recognition of the importance of the new health care provision in Rhondda Cynon Taf, the Council set a rate of £60, less than half of that at which it could have been set.

In light of the concerns expressed by the LHB, the Council undertook a review of the assumptions and viability appraisals contained in the original study. On the basis of this review, it is concluded that the original assessment of the viability of D1 Primary Healthcare taken as a whole remains sound. These rates make allowance for significant viability buffers to meet unknown costs and/or insignificant percentage differences in individual assumed costs.

Whilst the use in general remains viable, the Council recognises that development in this sector is complex and can come forward through a range of different provision models. Primary Healthcare developments include:-

- 1) easily identified commercial interests (such as “Health-fund” investors);
- 2) third sector investors (Housing Associations);
- 3) wholly public sector led developments (often referred to in Wales as “NHS Capital Projects”), and;
- 4) Doctor led developments (colloquially known as “GP DIY”).

The first two of these market sectors (Health funds & third sector investors) are easily identified within the viability evidence base as being able to support a CIL charge because there are private or third sector organisations investing in the development and these can be financially benchmarked and tested for economic viability.

The latter two (“NHS Capital Projects” and “GP DIY”) are not easily identified within the viability evidence because the capital funding either comes from the public sector or non-commercial private individuals (often in a partnerships) and the occupation costs (service charges, running costs etc) are in both cases met out of the Doctor’s NHS clinical earnings (sometimes supplemented by private earnings, which are limited to 10% of the GP’s NHS earnings for publically funded practices in Wales).

In simple terms, some Primary Healthcare developments are developed for profit with investors seeking a return and others are funded via the public sector to meet defined health objectives. GP DIY developments span the spectrum, with some being very commercially focussed and others much less so.

Given this, it is difficult to measure viability across the full spectrum of potential developments. Some would be highly viable and able to meet the upper end of the original CIL charging range (£125) and others will be at the lower end (£0).

In setting the rate at £60, the Council applied a viability buffer of 50% +. This allows a significant buffer which can absorb unknown costs. Whilst some developments would pay less than half of what they could potentially afford to pay, it was considered this approach struck an appropriate balance.

It is accepted however that a £60 rate represents a significant charge to those Primary Healthcare developments whose viability sits at the lower end of the recommended CIL charging range and/or those developments whose viability is less easy to establish. It is in this light that the LHB have repeated their original concerns.

The District Valuer recommends that consideration be given to whether it is possible to distinguish between different types of development in terms of size and whether it is possible to structure a CIL charging framework around this. On balance, it is considered that this approach is not appropriate. It could create an overly complicated CIL charging framework. There is also a question whether the fine grained evidence necessary to develop a sized based charging framework is readily or easily available.

In order to strike a more appropriate balance between funding the infrastructure on which new development will apply and supporting the ability of new development to come

forward, it is considered a 90% viability buffer should be applied to the charging range suggested by the DV. It is therefore recommended that the CIL rate for Primary Healthcare development be reduced to £10 for Rhondda Cynon Taf.

**Recommendation:** It is recommended the CIL charge for D1 (Primary Healthcare Development) be reduced to £10.



**Appendix 9: DVS Additional Appraisals & Report**



Further viability testing and  
review of proposed  
Community Infrastructure  
Levy in light of  
representations received by  
Rhondda Cynon Taf County  
Borough Council

Report for:

Rhondda Cynon Taf County  
Borough Council

Prepared by:

Nick Tyldesley BSc MRICS  
Principal Development Surveyor  
DVS

Tel: (03000) 507642

Email:

[nick.tyldesley@voa.gsi.gov.uk](mailto:nick.tyldesley@voa.gsi.gov.uk)

DVS Reference: 1434344/NGT

Client Reference: na

Date: October 2013

### Introduction

1. The purpose of the instructions received from Rhondda Cynon Taf County Borough Council (abbreviated to "RCT") is for DVS to undertake further viability testing in relation to RCT's proposed Community Infrastructure Levy (CIL). The need for this further viability testing is two-fold; Firstly, following completion of RCT's draft CIL charging schedule the council has received various representations from interested parties and these have led to the need for further testing to ensure that the representations are carefully considered and reflected upon. Secondly, RCT's original CIL study was published some 12 months ago and since then the property and development markets have seen improvements and so it is appropriate that the evidence base be refreshed and RCT's proposed CIL charges reviewed in light of this.

### The further testing undertaken

2. The particular representations that RCT sought our review of were received from the following parties and concerned the following matters:
  - **Home Builders Federation (via Savills)**- representations received concerning the level of CIL charge proposed for Zone 3 (£100 per square metre) and the positioning of the Zone 3 boundary (most particularly the inclusion of the Tonyrefail area within Zone 3).
  - **McCarthy & Stone and Churchill retirement living (via The Planning Bureau)**-representations received concerning the ability of sheltered (Also known as "later living") housing to support similar levels of CIL as more traditional housing developments. The representation particularly focused upon the Zone 3 level of CIL charge proposed.
  - **Cwm Taf Health Board**- Representations received concerning the proposed CIL charge for new D1 primary healthcare developments.
3. The further viability testing that we undertook was conducted throughout September and October 2013 and we produced a range of appraisals, the most helpful of which I append to the back of this report and (for reference) highlight below;
  - A review of the Savills' hypothetical residential development appraisals for Zone 2 and 3. These appraisals are included at **Appendices A to D** and the CIL rate results are tabulated at **Appendix E**.
  - A review of notional residential development schemes on three of RCT's strategic sites. These appraisals are included at **Appendices F, G and H** and the CIL rate results are tabulated at **Appendix I**.
  - A review of sheltered housing development schemes on three notional RCT site scenarios. These appraisals are included at **Appendices J, K and L** and the CIL rate results are tabulated at **Appendix M**.

### Summary comments in respect of further testing related to representations made by Home Builders Federation and Savills

4. In respect of the appraisals undertaken, there are quite a number of appraisal inputs where Savills and I hold different views. In general, these differences are not substantial but cumulatively they do lead to a divergence in our overall viability views. During the consultation process these differences have been highlighted and discussed but no agreement has been reached.
5. In this further testing I have run quite a number of different scenarios for RCT to illustrate the impact of these variances in input assumptions. Whilst I am unable to agree Savills inputs, discussions with RCT have led us to

conclude that a positive approach here would be to adopt Savills assumptions in some of the further viability work but focus on the inputs that cause greatest difficulty. In this instance, these are the allowances for s106, fire sprinklers and external works.

6. In light of the above, and to keep this note concise and focused, I have only reproduced four appraisals with this report. These four appraisals (found at **Appendices A to D**) are effectively Savills appraisals but with the allowance for external works reduced from 27% to 20%, and the allowances for s106 and fire sprinklers having been completely removed. The rationale for these changes is already detailed elsewhere within RCT response to representations.
7. The appraisals found at **Appendices A to D** essentially represent what I consider to be the more pessimistic end of viability for Zones 2 and 3 in RCT. As you will see at **Appendix E**, when a 30% viability buffer (As Savills suggest) is applied, these result in residual CIL rates of £53 to £57 per square metre for Zone 2 and £82 to £87 square metre for Zone 3.
8. In light of the above and other testing I have recommended that consideration be given to the RCT Zone 3 rate being revised to £85 per square metre. With regard to the Zone 2 rate, whilst there is evidence for an increase in this rate wider viability evidence leads me to conclude that there is an inherent deliverability risk associated with such and accordingly I have not recommended a change to this rate.
9. Moving onto the question of which charging zone the Tonyrefail area best sits, I have considered the sales and other evidence provided in the representations by the Home Builders Federation (HBF) and Savills alongside other viability evidence and I am of the view that the charging zone boundary be amended so that the Tonyrefail area now sits within Zone 2.

#### Summary comments in respect of further testing related to sample of Strategic Sites in RCT

10. The three strategic site locations selected for testing were chosen by RCT on the basis that they were representative of a range of different site circumstances. A number of scenarios were carefully considered and discussed but the final appraisals run and included within this briefing have been undertaken on a notional scheme basis similar to that proposed in Savills representations addressed earlier in this note.
11. In accordance with the above, I reproduced three notional Strategic Site appraisals at **Appendices F, G and H**. Savills/HBF have not made specific representations in respect of these Strategic Sites but, as previously noted, I have adopted a similar approach in these appraisals. However, as before, the principle headline divergence from Savills/HBF is the removal of allowances for s106 and fire sprinklers and the adoption of a 20% allowance for external works (Savills/HBF have suggested 27%). I must also note that my allowances for marketing, finance and developer profit are harmonised with my original study assumptions (and not Savills appraisal assumptions).
12. As you will see at **Appendix I**, when a 30% viability buffer (As Savills suggest) is applied, the appraisals found at **Appendices F, G and H** generate residual CIL rates of £79.97 to £115.30 per square metre (with an average of £100.51 per square metre) for these Zone 3 Strategic sites.

13. It is fair to say that some of RCT's Strategic Sites would appear to have significant development challenges, however they also benefit from scaling and from RCT's targeted planning delivery strategy. In light of this, and the viability results I am content that there is no case for a separate CIL charging policy for the RCT Strategic Sites.

Summary comments in respect of testing of Sheltered Housing developments in RCT

14. Sheltered housing schemes for older persons are typically characterised by self-contained apartments that are purchased by older persons on long leaseholds where ground rents are met by the purchaser (as is typical with such properties). Sheltered housing significantly differs from other housing not only in the age profile of its occupiers but also the higher management / service charges that are paid by the occupants in lieu of the onsite facilities and management team that are provided and enable the older occupiers to maintain a degree of independence for longer than may otherwise be possible.
15. In light of the representations received from the Planning Bureau, three notional development scheme scenarios have been considered for sheltered housing (two in Zone 3 and one in Zone 2) and tested for viability. The Planning Bureau representations have been made on behalf of McCarthy and Stone and Churchill Retirement Living. Unfortunately, at the time of review, there were no active Churchill developments within RCT (or Wales) but there are a number of active McCarthy and Stone developments throughout Wales (though none in RCT itself) and I have had regard to the scheme data retrieved from these.
16. The Planning Bureau has also provided a range of viability information themselves (which has been acquired through their clients). My colleagues in England have dealt with quite a number of McCarthy and Stone and Churchill Retirement Living developments and the submissions made by the Planning Bureau are similar to other CIL representations made. It is beyond the scope of this particular paper to review the detail of these submissions (though that exercise has been done) but essentially the case made by the Planning Bureau is that Sheltered housing developments incur greater construction, finance (e.g. extended holding costs) and development risk (i.e. profit benchmarks) costs than conventional housing. Whilst I am not able to agree all the points and inputs proffered by the Planning Bureau I can say that in general terms I accept that these developments do incur costs greater than conventional housing.
17. Whilst I accept that greater costs are typically borne by Sheltered housing developments this is, to one extent or another, offset by the higher sale prices achieved by such schemes. Having regard to the sales data at hand, I have also factored in a range of sales scenarios that I believe would be appropriate for Zones 2 and 3. I reproduced these three notional Sheltered housing appraisals at **Appendices J, K and L**.
18. You will note from **Appendix M**, that the Zone 3 Sheltered Housing appraisals generate, with a 30% viability buffer, residual CIL rates of £130.26 to £265.65 per square metre and the Zone 2 scenario generates a residual CIL rate of £58.68 per square metre (with a 30% viability buffer). These residual CIL rates certainly suggest that the Sheltered Housing developments can support the proposed levels of CIL. Indeed, the rates may even suggest a higher rate of CIL is sustainable. However, I would urge some caution here because such developments are very dependent on specific market conditions existing (Which partly explains why sheltered housing is far less common than conventional housing developments) and as such I believe they

should not have CIL charge rates differentiated from the rest of the residential market.

Summary comments in respect of further review of D1 Primary Healthcare development

19. No specific viability evidence has been provided in the representations made by Cwm Taf Health Board. However, it is clear from the practical discussions I have had with RCT that further review is appropriate. The principle difficulty with setting a charge for this development class is that there is clear viability evidence in support of charging CIL in respect of the private and third sector investors; but not “NHS Capital Projects” or “GP DIY” developments. Since it appears to be practically impossible (from a CIL charging perspective) to disaggregate the private and third sector investors from “NHS Capital Projects” or “GP DIY” developments I would suggest that a higher level strategic view is taken by RCT.
20. One area which my further review has identified as having potential for some differentiation of CIL charge is development size. The viability testing from our original study provided counter-intuitive results in respect of development size but this was a small sample and each scheme was very specific to a range of factors including land cost and the scope of occupiers so we did not originally advocate differential rates based on size. However, it is clear from further review of actual Healthcare development schemes across Wales that a minimum size for charging CIL on D1 Primary Healthcare developments is appropriate.
21. From analysis of D1 Primary Healthcare developments in Wales it is clear that a threshold of 235 square metres (measured to Gross Internal Area, as with other CIL charges) is the typical point at which GP DIY development schemes would fall below and larger private, third sector and “NHS Capital Projects” would begin. Therefore, if your charging threshold were lifted to 235 square metres this would largely remove GP DIY development schemes from the charging equation. “NHS Capital Projects” would still be left with private / third sector developments but I believe this is some improvement on the existing situation (i.e. absence of viability evidence for “NHS Capital Projects” or “GP DIY” developments) and I recommend that you give this option further consideration.

Conclusion

22. I trust that the foregoing notes (and supporting appendices) are of assistance to your review of the representations received.

Yours faithfully

**Nick Tyldesley, BSc (Hons), MRICS**

**Principal Development Surveyor**

**DVS**

**List of Appendices- Overleaf>**

**List of Appendices**

**Appendix A-** DVS appraisal of Savills' Zone 2 (50 units) submission

**Appendix B-** DVS appraisal of Savills' Zone 2 (100 units) submission

**Appendix C-** DVS appraisal of Savills' Zone 3 (50 units) submission

**Appendix D-** DVS appraisal of Savills' Zone 3 (100 units) submission

**Appendix E-** Tabulated summary of DVS CIL rates (with a 30% viability buffer) arising from appraisals at appendices A to D

**Appendix F-** DVS appraisal of a notional residential development scheme at the 825 unit Strategic site

**Appendix G-** DVS appraisal of a notional residential development scheme at the 500 unit Strategic site

**Appendix H-** DVS appraisal of a notional residential development scheme at the 1850 unit Strategic site

**Appendix I-** Tabulated summary of DVS CIL rates (with a 30% viability buffer) arising from appraisals at appendices F to G

**Appendix J-** DVS appraisal of a notional sheltered housing development scheme in Zone 3 (higher sales)

**Appendix K-** DVS appraisal of a notional sheltered housing development scheme in Zone 3 (lower sales)

**Appendix L-** DVS appraisal of a notional sheltered housing development scheme in Zone 2 (Entry level sales)

**Appendix M-** Tabulated summary of DVS CIL rates (with a 30% viability buffer) arising from appraisals at appendices J to L

# Valuation Office Agency

## Development Appraisal

DVS reproduction of Savills assumptions (07/08/13)

Zone 2 - 50 units (BUT 20% ew-no s106-no Fire)

Report Date: 23 October 2013

**APPRAISAL SUMMARY****VALUATION OFFICE AGENCY**

DVS reproduction of Savills assumptions (07/08/13)  
 Zone 2 - 50 units (BUT 20% ew-no s106-no Fire)

Summary Appraisal for Merged Phases 1 2

Currency in £

**REVENUE**

Sales Valuation	Units	ft <sup>2</sup>	Rate ft <sup>2</sup>	Unit Price	Gross Sales
Market Housing	40	45,320	165.00	186,945	7,477,800
2 bed house (AFH)	5	3,150	98.87	62,288	311,441
3 bed house (AFH)	<u>5</u>	<u>3,750</u>	92.06	69,048	<u>345,240</u>
<b>Totals</b>	<b>50</b>	<b>52,220</b>			<b>8,134,481</b>

**NET REALISATION**

**8,134,481**

**OUTLAY****ACQUISITION COSTS**

Residualised Price (3.57 Acres 111,114.29 pAcre) 396,678  
 396,678

**Other Acquisition**

Fixed price (for land) 803,250  
 SDLT on fixed price 38,459  
 Agent fee on fixed price 9,615  
 Legal fees on fixed price 4,807  
 856,131

**CONSTRUCTION COSTS**

Construction	ft <sup>2</sup>	Rate ft <sup>2</sup>	Cost
Market Housing	45,320 ft <sup>2</sup>	70.00 pf <sup>2</sup>	3,172,400
2 bed house (AFH)	3,150 ft <sup>2</sup>	70.00 pf <sup>2</sup>	220,500
3 bed house (AFH)	<u>3,750 ft<sup>2</sup></u>	70.00 pf <sup>2</sup>	<u>262,500</u>
<b>Totals</b>	<b>52,220 ft<sup>2</sup></b>		<b>3,655,400</b>

**3,655,400**

Contingency 3.00% 109,662  
 109,662

**APPRAISAL SUMMARY****VALUATION OFFICE AGENCY****DVS reproduction of Savills assumptions (07/08/13)****Zone 2 - 50 units (BUT 20% ew-no s106-no Fire)****Other Construction**

External allowances	20.00%	731,080		731,080
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**PROFESSIONAL FEES**

Other Professionals (OMH)	8.00%	253,792		
Other Professionals (AFH)	8.00%	38,640		292,432

**MARKETING & LETTING**

Sales, marketing & legals (OMH)	3.00%	224,334		224,334
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**DISPOSAL FEES**

Sales Legal Fee	40 un	750.00 /un	30,000	
Sales Legal Fee	10 un	500.00 /un	5,000	35,000

**FINANCE**

Debit Rate 7.000% Credit Rate 0.000% (Nominal)				
Total Finance Cost				252,862

**TOTAL COSTS****6,553,579****PROFIT****1,580,901****Performance Measures**

Profit on Cost%	24.12%
Profit on GDV%	19.43%
Profit on NDV%	19.43%
IRR	37.14%
Profit Erosion (finance rate 7.000%)	3 yrs 1 mth

# Valuation Office Agency

## Development Appraisal

DVS reproduction of Savills assumptions (07/08/13)

Zone 2 - 100 units (BUT 20% ew-no s106-no Fire)

Report Date: 23 October 2013

**APPRAISAL SUMMARY****VALUATION OFFICE AGENCY**

DVS reproduction of Savills assumptions (07/08/13)  
 Zone 2 - 100 units (BUT 20% ew-no s106-no Fire)

Summary Appraisal for Merged Phases 1 2

Currency in £

**REVENUE**

Sales Valuation	Units	ft <sup>2</sup>	Rate ft <sup>2</sup>	Unit Price	Gross Sales
Market Housing	80	90,640	165.00	186,945	14,955,600
2 bed house (AFH)	10	6,300	98.87	62,288	622,881
3 bed house (AFH)	<u>10</u>	<u>7,500</u>	92.06	69,048	<u>690,480</u>
<b>Totals</b>	<b>100</b>	<b>104,440</b>			<b>16,268,961</b>

**NET REALISATION**

**16,268,961**

**OUTLAY****ACQUISITION COSTS**

Residualised Price (7.14 Acres 103,094.58 pAcre) 736,095  
 736,095

**Other Acquisition**

Fixed price (for land) 1,606,500  
 SDLT on fixed price 77,591  
 Agent fee on fixed price 19,398  
 Legal fees on fixed price 9,699  
 1,713,188

**CONSTRUCTION COSTS**

Construction	ft <sup>2</sup>	Rate ft <sup>2</sup>	Cost
Market Housing	90,640 ft <sup>2</sup>	70.00 pf <sup>2</sup>	6,344,800
2 bed house (AFH)	6,300 ft <sup>2</sup>	70.00 pf <sup>2</sup>	441,000
3 bed house (AFH)	<u>7,500 ft<sup>2</sup></u>	70.00 pf <sup>2</sup>	<u>525,000</u>
<b>Totals</b>	<b>104,440 ft<sup>2</sup></b>		<b>7,310,800</b>

**7,310,800**

Contingency 3.00% 219,324  
 219,324

**APPRAISAL SUMMARY****VALUATION OFFICE AGENCY**

DVS reproduction of Savills assumptions (07/08/13)

Zone 2 - 100 units (BUT 20% ew-no s106-no Fire)

**Other Construction**

External allowances	20.00%	1,462,160	1,462,160
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**PROFESSIONAL FEES**

Other Professionals (OMH)	8.00%	507,584	
Other Professionals (AFH)	8.00%	77,280	584,864

**MARKETING & LETTING**

Sales, marketing & legals (OMH)	3.00%	448,668	448,668
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**DISPOSAL FEES**

Sales Legal Fee	80 un	750.00 /un	60,000	
Sales Legal Fee	20 un	500.00 /un	10,000	70,000

**FINANCE**

Debit Rate 7.000% Credit Rate 0.000% (Nominal)				
Total Finance Cost				484,729

**TOTAL COSTS****13,029,828****PROFIT****3,239,133****Performance Measures**

Profit on Cost%	24.86%
Profit on GDV%	19.91%
Profit on NDV%	19.91%
IRR	32.20%
Profit Erosion (finance rate 7.000%)	3 yrs 2 mths

# Valuation Office Agency

## Development Appraisal

DVS reproduction of Savills assumptions (07/08/13)

Zone 3 - 50 units (BUT 20% ew-no s106-no Fire)

Report Date: 04 October 2013

**APPRAISAL SUMMARY****VALUATION OFFICE AGENCY**

DVS reproduction of Savills assumptions (07/08/13)  
 Zone 3 - 50 units (BUT 20% ew-no s106-no Fire)

Summary Appraisal for Merged Phases 1 2

Currency in £

**REVENUE**

Sales Valuation	Units	ft <sup>2</sup>	Rate ft <sup>2</sup>	Unit Price	Gross Sales
Market Housing	40	45,320	175.00	198,275	7,931,000
2 bed house (AFH)	5	3,150	98.87	62,288	311,441
3 bed house (AFH)	<u>5</u>	<u>3,750</u>	92.06	69,048	<u>345,240</u>
<b>Totals</b>	<b>50</b>	<b>52,220</b>			<b>8,587,681</b>

**NET REALISATION**

**8,587,680**

**OUTLAY****ACQUISITION COSTS**

Residualised Price (3.57 Acres 169,450.78 pAcre) 604,939  
 604,939

**Other Acquisition**

Fixed price (for land) 892,500  
 SDLT on fixed price 50,545  
 Agent fee on fixed price 12,636  
 Legal fees on fixed price 6,318  
 961,999

**CONSTRUCTION COSTS**

Construction	ft <sup>2</sup>	Rate ft <sup>2</sup>	Cost
Market Housing	45,320 ft <sup>2</sup>	70.00 pf <sup>2</sup>	3,172,400
2 bed house (AFH)	3,150 ft <sup>2</sup>	70.00 pf <sup>2</sup>	220,500
3 bed house (AFH)	<u>3,750 ft<sup>2</sup></u>	70.00 pf <sup>2</sup>	<u>262,500</u>
<b>Totals</b>	<b>52,220 ft<sup>2</sup></b>		<b>3,655,400</b>

**3,655,400**

Contingency 3.00% 109,662  
 109,662

**APPRAISAL SUMMARY****VALUATION OFFICE AGENCY**

DVS reproduction of Savills assumptions (07/08/13)

Zone 3 - 50 units (BUT 20% ew-no s106-no Fire)

**Other Construction**

External allowances	20.00%	731,080	
			731,080

**PROFESSIONAL FEES**

Other Professionals (OMH)	8.00%	253,792	
Other Professionals (AFH)	8.00%	38,640	
			292,432

**MARKETING & LETTING**

Sales, marketing & legals (OMH)	3.00%	237,930	
			237,930

**DISPOSAL FEES**

Sales Legal Fee	40 un	750.00 /un	30,000	
Sales Legal Fee	10 un	500.00 /un	5,000	
				35,000

**FINANCE**

Debit Rate 7.000% Credit Rate 0.000% (Nominal)			
Total Finance Cost			287,697

**TOTAL COSTS****6,916,139****PROFIT****1,671,541****Performance Measures**

Profit on Cost%	24.17%
Profit on GDV%	19.46%
Profit on NDV%	19.46%
IRR	35.34%
Profit Erosion (finance rate 7.000%)	3 yrs 1 mth

# Valuation Office Agency

## Development Appraisal

DVS reproduction of Savills assumptions (07/08/13)

Zone 3 - 100 units (BUT 20% ew-no s106-no Fire)

Report Date: 04 October 2013

**APPRAISAL SUMMARY****VALUATION OFFICE AGENCY**

DVS reproduction of Savills assumptions (07/08/13)  
 Zone 3 - 100 units (BUT 20% ew-no s106-no Fire)

Summary Appraisal for Merged Phases 1 2

Currency in £

**REVENUE**

Sales Valuation	Units	ft <sup>2</sup>	Rate ft <sup>2</sup>	Unit Price	Gross Sales
Market Housing	80	90,640	175.00	198,275	15,862,000
2 bed house (AFH)	10	6,300	98.87	62,288	622,881
3 bed house (AFH)	<u>10</u>	<u>7,500</u>	92.06	69,048	<u>690,480</u>
<b>Totals</b>	<b>100</b>	<b>104,440</b>			<b>17,175,361</b>

**NET REALISATION**

**17,175,361**

**OUTLAY****ACQUISITION COSTS**

Residualised Price (7.14 Acres 158,741.27 pAcre) 1,133,413  
 1,133,413

**Other Acquisition**

Fixed price (for land) 1,785,000  
 SDLT on fixed price 99,597  
 Agent fee on fixed price 24,899  
 Legal fees on fixed price 12,450  
 1,921,946

**CONSTRUCTION COSTS**

Construction	ft <sup>2</sup>	Rate ft <sup>2</sup>	Cost
Market Housing	90,640 ft <sup>2</sup>	70.00 pf <sup>2</sup>	6,344,800
2 bed house (AFH)	6,300 ft <sup>2</sup>	70.00 pf <sup>2</sup>	441,000
3 bed house (AFH)	<u>7,500 ft<sup>2</sup></u>	70.00 pf <sup>2</sup>	<u>525,000</u>
<b>Totals</b>	<b>104,440 ft<sup>2</sup></b>		<b>7,310,800</b>

**7,310,800**

Contingency 3.00% 219,324  
 219,324

**APPRAISAL SUMMARY****VALUATION OFFICE AGENCY**

DVS reproduction of Savills assumptions (07/08/13)

Zone 3 - 100 units (BUT 20% ew-no s106-no Fire)

**Other Construction**

External allowances	20.00%	1,462,160	1,462,160
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**PROFESSIONAL FEES**

Other Professionals (OMH)	8.00%	507,584	
Other Professionals (AFH)	8.00%	77,280	584,864

**MARKETING & LETTING**

Sales, marketing & legals (OMH)	3.00%	475,860	475,860
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**DISPOSAL FEES**

Sales Legal Fee	80 un	750.00 /un	60,000	
Sales Legal Fee	20 un	500.00 /un	10,000	70,000

**FINANCE**

Debit Rate 7.000% Credit Rate 0.000% (Nominal)				
Total Finance Cost				576,581

**TOTAL COSTS****13,754,948****PROFIT****3,420,413****Performance Measures**

Profit on Cost%	24.87%
Profit on GDV%	19.91%
Profit on NDV%	19.91%
IRR	30.19%
Profit Erosion (finance rate 7.000%)	3 yrs 2 mths

Site-by-site summary of residential appraisal results

Printed: 30/10/2013

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U
Ref no.	Site	Site area (acres)	GDV	GBC, including Land & Profit but not CIL	Total units	% AFH	Total square feet (GIA/ EFA)	Sqft built per net acre	Dwellings per hectare	Average (OMH & AFH) £s per sqft	S106 Costs	Benchmark Land value (Reflecting vendor incentive)	BMLV- £s per ACRE	BMLV- % of GDV	Residualised value for CIL	CIL Residual- £s per square METRE	DVS CIL rate, AFTER Savills 30% buffer, expressed in £s per square METRE	Savills Aug13 CIL rate (After their 30% buffer)- £s per SQM	RCT draft CIL rate- £s per SQM	RCT CIL as % of development cost
1	Appendix A- Zone 2 - 50 units (20% externals-no s106-no fire sprinklers BUT mostly Savills' assumptions)	3.57	£8,134,481	£7,737,803	50	20%	52,220	14,627	34.61	£156	Zero	£803,250	£225,000	9.9%	£396,678	£82	£57	£10.00	£40.00	2.51%
2	Appendix B- Zone 2 - 100 units (20% externals-no s106-no fire sprinklers BUT mostly Savills' assumptions)	7.14	£16,268,961	£15,532,866	100	20%	104,442	14,628	34.61	£156	Zero	£1,606,500	£225,000	9.9%	£736,095	£76	£53	£11.50	£40.00	2.50%
3	Appendix C- Zone 3 - 50 units (20% externals-no s106-no fire sprinklers BUT mostly Savills' assumptions)	3.57	£8,587,680	£7,982,741	50	20%	52,220	14,627	34.61	£164	Zero	£892,500	£250,000	10.4%	£604,939	£125	£87	£45.50	£85.00	5.17%
4	Appendix D- Zone 3 - 100 units (20% externals-no s106-no fire sprinklers BUT mostly Savills' assumptions)	7.14	£17,175,361	£16,041,948	100	20%	104,442	14,628	34.61	£164	Zero	£1,785,002	£250,000	10.4%	£1,133,413	£117	£82	£42.00	£85.00	5.14%

# Valuation Office Agency

## Development Appraisal

DVS review of 825 unit Strategic site

20% externals, no s106 nor Abnormals

Report Date: 23 October 2013

**APPRAISAL SUMMARY****VALUATION OFFICE AGENCY**

DVS review of 825 unit Strategic site  
20% externals, no s106 nor Abnormals

Summary Appraisal for Merged Phases 1 2

Currency in £

**REVENUE**

Sales Valuation	Units	m <sup>2</sup>	Rate m <sup>2</sup>	Unit Price	Gross Sales	Adjustment	Net Sales
2 bed (69) HT	132	9,108.00	1,739.13	120,000	15,840,000	0	15,840,000
3 bed (95) HS	132	12,540.00	1,684.21	160,000	21,120,000	0	21,120,000
3 bed (100) HD	132	13,200.00	1,700.00	170,000	22,440,000	0	22,440,000
4 bed (120) HS	132	15,840.00	1,666.67	200,000	26,400,000	0	26,400,000
4 bed (130) HD	132	17,160.00	1,692.31	220,000	29,040,000	0	29,040,000
1 bed flat (51) SR	66	2,804.89	844.27	35,880	2,368,080	0	2,368,080
2 bed house (83) SR	33	2,739.00	696.83	57,837	1,908,621	0	1,908,621
3 bed house (94) SR	12	1,128.00	682.09	64,116	769,392	0	769,392
4 bed house (110) SR	11	1,210.00	678.60	74,646	821,106	0	821,106
2 bed house (68) LCHO	33	2,244.00	1,764.71	120,000	3,960,000	(1,188,000)	2,772,000
3 bed house (78) LCHO	<u>10</u>	<u>780.00</u>	<u>1,730.77</u>	<u>135,000</u>	<u>1,350,000</u>	<u>(405,000)</u>	<u>945,000</u>
<b>Totals</b>	<b>825</b>	<b>78,753.89</b>			<b>126,017,199</b>	<b>(1,593,000)</b>	<b>124,424,199</b>

**NET REALISATION**

**124,424,199**

**OUTLAY****ACQUISITION COSTS**

Residualised Price (19.30 Ha 676,885.05 pHect) 13,063,882  
13,063,882

**Other Acquisition**

Fixed price (for land) 3,100,586  
SDLT on fixed price 7.00% 217,041  
Agent fee on fixed price 0.75% 23,254  
Legal fees on fixed price 0.75% 23,254  
3,364,136

**CONSTRUCTION COSTS**

**APPRAISAL SUMMARY****VALUATION OFFICE AGENCY****DVS review of 825 unit Strategic site  
20% externals, no s106 nor Abnormals**

<b>Construction</b>	<b>m<sup>2</sup></b>	<b>Rate m<sup>2</sup></b>	<b>Cost</b>	
2 bed (69) HT	9,108.00 m <sup>2</sup>	753.50 pm <sup>2</sup>	6,862,878	
3 bed (95) HS	12,540.00 m <sup>2</sup>	753.50 pm <sup>2</sup>	9,448,890	
3 bed (100) HD	13,200.00 m <sup>2</sup>	753.50 pm <sup>2</sup>	9,946,200	
4 bed (120) HS	15,840.00 m <sup>2</sup>	753.50 pm <sup>2</sup>	11,935,440	
4 bed (130) HD	17,160.00 m <sup>2</sup>	753.50 pm <sup>2</sup>	12,930,060	
1 bed flat (51) SR	3,366.00 m <sup>2</sup>	938.00 pm <sup>2</sup>	3,157,308	
2 bed house (83) SR	2,739.00 m <sup>2</sup>	753.50 pm <sup>2</sup>	2,063,836	
3 bed house (94) SR	1,128.00 m <sup>2</sup>	753.50 pm <sup>2</sup>	849,948	
4 bed house (110) SR	1,210.00 m <sup>2</sup>	753.50 pm <sup>2</sup>	911,735	
2 bed house (68) LCHO	2,244.00 m <sup>2</sup>	753.50 pm <sup>2</sup>	1,690,854	
3 bed house (78) LCHO	780.00 m <sup>2</sup>	753.50 pm <sup>2</sup>	587,730	
<b>Totals</b>	<b>79,315.00 m<sup>2</sup></b>		<b>60,384,879</b>	<b>60,384,879</b>
Contingency		2.50%	1,509,622	1,509,622
<b>Other Construction</b>				
External allowances		20.00%	12,076,976	12,076,976
<b>PROFESSIONAL FEES</b>				
Other Professionals (OMH)		8.00%	4,089,877	
Other Professionals (AFH)		8.00%	740,913	4,830,790
<b>MARKETING &amp; LETTING</b>				
Sales, marketing & legals (OMH)		3.00%	3,445,200	
Sales, marketing & legals (AFH)		1.50%	143,763	3,588,963
<b>FINANCE</b>				
Debit Rate 6.000% Credit Rate 5.200% (Nominal)				
Total Finance Cost				4,078,091
<b>TOTAL COSTS</b>				<b>102,897,339</b>

**APPRAISAL SUMMARY****VALUATION OFFICE AGENCY**

DVS review of 825 unit Strategic site  
20% externals, no s106 nor Abnormals  
PROFIT

21,526,860

**Performance Measures**

Profit on Cost%	20.92%
Profit on GDV%	17.30%
Profit on NDV%	17.30%
IRR	13.66%
Profit Erosion (finance rate 6.000%)	3 yrs 2 mths

# Valuation Office Agency

## Development Appraisal

DVS re 500 unit Strategic site

20% Externals but no S106 & no Abnormal costs

Report Date: 23 October 2013

**APPRAISAL SUMMARY****VALUATION OFFICE AGENCY**

DVS re 500 unit Strategic site  
20% Externals but no S106 & no Abnormal costs

Summary Appraisal for Merged Phases 1 2

Currency in £

**REVENUE**

Sales Valuation	Units	m <sup>2</sup>	Rate m <sup>2</sup>	Unit Price	Gross Sales	Adjustment	Net Sales
2 Bed (69 DVS) HT	80	5,520.00	1,739.13	120,000	9,600,000	0	9,600,000
3 Bed (95 DVS) HS	80	7,600.00	1,736.84	165,000	13,200,000	0	13,200,000
3 Bed (100 DVS) HD	80	8,000.00	1,800.00	180,000	14,400,000	0	14,400,000
4 Bed (120 DVS) HS	80	9,600.00	1,750.00	210,000	16,800,000	0	16,800,000
4 Bed (130) HD	80	10,400.00	1,807.69	235,000	18,800,000	0	18,800,000
1Bed flat (51) SR	40	1,699.93	844.27	35,880	1,435,200	0	1,435,200
2 Bed (83) HS SR	20	1,660.00	696.83	57,837	1,156,740	0	1,156,740
3 Bed (94) HS SR	7	658.00	682.09	64,116	448,812	0	448,812
4 Bed (110) HS SR	7	770.00	678.60	74,646	522,522	0	522,522
2 Bed (68) HS LCHO	20	1,360.00	1,838.24	125,000	2,500,000	(750,000)	1,750,000
3 Bed (78) HS LCHO	6	468.00	1,730.77	135,000	810,000	(243,000)	567,000
<b>Totals</b>	<b>500</b>	<b>47,735.93</b>			<b>79,673,274</b>	<b>(993,000)</b>	<b>78,680,274</b>

**NET REALISATION**

**78,680,274**

**OUTLAY****ACQUISITION COSTS**

Residualised Price (20.24 Ha 213,174.14 pHect) 4,314,645  
4,314,645

**Other Acquisition**

Land cost benchmark 7,853,588  
SDLT 7.00% 549,751  
Agent 0.75% 58,902  
Legals 0.75% 58,902  
8,521,143

**CONSTRUCTION COSTS**

**APPRAISAL SUMMARY****VALUATION OFFICE AGENCY****DVS re 500 unit Strategic site****20% External costs but no S106 & no Abnormal costs**

<b>Construction</b>	<b>m<sup>2</sup></b>	<b>Rate m<sup>2</sup></b>	<b>Cost</b>	
2 Bed (69 DVS) HT	5,520.00 m <sup>2</sup>	753.50 pm <sup>2</sup>	4,159,320	
3 Bed (95 DVS) HS	7,600.00 m <sup>2</sup>	753.50 pm <sup>2</sup>	5,726,600	
3 Bed (100 DVS) HD	8,000.00 m <sup>2</sup>	753.50 pm <sup>2</sup>	6,028,000	
4 Bed (120 DVS) HS	9,600.00 m <sup>2</sup>	753.50 pm <sup>2</sup>	7,233,600	
4 Bed (130) HD	10,400.00 m <sup>2</sup>	753.50 pm <sup>2</sup>	7,836,400	
1Bed flat (51) SR	2,040.00 m <sup>2</sup>	938.00 pm <sup>2</sup>	1,913,520	
2 Bed (83) HS SR	1,660.00 m <sup>2</sup>	753.50 pm <sup>2</sup>	1,250,810	
3 Bed (94) HS SR	658.00 m <sup>2</sup>	753.50 pm <sup>2</sup>	495,803	
4 Bed (110) HS SR	770.00 m <sup>2</sup>	753.50 pm <sup>2</sup>	580,195	
2 Bed (68) HS LCHO	1,360.00 m <sup>2</sup>	753.50 pm <sup>2</sup>	1,024,760	
3 Bed (78) HS LCHO	468.00 m <sup>2</sup>	753.50 pm <sup>2</sup>	352,638	
<b>Totals</b>	<b>48,076.00 m<sup>2</sup></b>		<b>36,601,646</b>	<b>36,601,646</b>
Contingency		2.50%	915,041	915,041
<b>Other Construction</b>				
External works & Sustainability		20.00%	7,320,329	7,320,329
<b>PROFESSIONAL FEES</b>				
Architect		8.00%	3,513,758	3,513,758
<b>DISPOSAL FEES</b>				
Sales Agent Fee		2.00%	1,456,000	
Sales Agent Fee		0.50%	29,401	
Sales Legal Fee		1.00%	786,803	
				2,272,204
<b>FINANCE</b>				
Debit Rate 6.000% Credit Rate 5.200% (Nominal)				
Total Finance Cost				1,794,440
<b>TOTAL COSTS</b>				<b>65,253,206</b>

**APPRAISAL SUMMARY****VALUATION OFFICE AGENCY**

DVS re 500 unit Strategic site  
20% Externals but no S106 & no Abnormal costs  
PROFIT

**13,427,068**

**Performance Measures**

Profit on Cost%	20.58%
Profit on GDV%	17.07%
Profit on NDV%	17.07%
IRR	17.16%
Profit Erosion (finance rate 6.000%)	3 yrs 2 mths

# Valuation Office Agency

## Development Appraisal

DVS re 1850 unit Strategic site

Externals to 20%-No s106-No Abnormals

Report Date: 23 October 2013

**APPRAISAL SUMMARY****VALUATION OFFICE AGENCY**

DVS re 1850 unit Strategic site  
 Externals to 20%-No s106-No Abnormals

Summary Appraisal for Merged Phases 1 2

Currency in £

**REVENUE**

Sales Valuation	Units	m <sup>2</sup>	Rate m <sup>2</sup>	Unit Price	Gross Sales	Adjustment	Net Sales
2 bed (69) HT	296	20,424.00	1,739.13	120,000	35,520,000	0	35,520,000
3 bed (95) HS	296	28,120.00	1,736.84	165,000	48,840,000	0	48,840,000
3 bed (100) HD	296	29,600.00	1,800.00	180,000	53,280,000	0	53,280,000
4 bed (120) HS	296	35,520.00	1,750.00	210,000	62,160,000	0	62,160,000
4 bed (130) HD	296	38,480.00	1,807.69	235,000	69,560,000	0	69,560,000
1 bed flat (51) SR	148	6,289.75	844.27	35,880	5,310,240	0	5,310,240
2 bed house (83) SR	74	6,142.00	696.83	57,837	4,279,938	0	4,279,938
3 bed house (94) SR	26	2,444.00	682.09	64,116	1,667,016	0	1,667,016
4 bed house (110) SR	26	2,860.00	678.60	74,646	1,940,796	0	1,940,796
2 bed house (68) LCHO	74	5,032.00	1,838.24	125,000	9,250,000	(2,775,000)	6,475,000
3 bed house (78) LCHO	22	1,716.00	1,730.77	135,000	2,970,000	(891,000)	2,079,000
<b>Totals</b>	<b>1,850</b>	<b>176,627.75</b>			<b>294,777,990</b>	<b>(3,666,000)</b>	<b>291,111,990</b>

**NET REALISATION**

**291,111,990**

**OUTLAY****ACQUISITION COSTS**

Residualised Price (50.00 Ha 406,449.72 pHect)

20,322,486

20,322,486

**Other Acquisition**

Fixed price (for land)

23,904,276

SDLT on fixed price

7.00% 1,673,299

Agent fee on fixed price

0.75% 179,282

Legal fees on fixed price

0.75% 179,282

25,936,139

**CONSTRUCTION COSTS**

**APPRAISAL SUMMARY****VALUATION OFFICE AGENCY****DVS re 1850 unit Strategic site****Externals to 20%-No s106-No Abnormals**

<b>Construction</b>	<b>m<sup>2</sup></b>	<b>Rate m<sup>2</sup></b>	<b>Cost</b>	
2 bed (69) HT	20,424.00 m <sup>2</sup>	753.50 pm <sup>2</sup>	15,389,484	
3 bed (95) HS	28,120.00 m <sup>2</sup>	753.50 pm <sup>2</sup>	21,188,420	
3 bed (100) HD	29,600.00 m <sup>2</sup>	753.50 pm <sup>2</sup>	22,303,600	
4 bed (120) HS	35,520.00 m <sup>2</sup>	753.50 pm <sup>2</sup>	26,764,320	
4 bed (130) HD	38,480.00 m <sup>2</sup>	753.50 pm <sup>2</sup>	28,994,680	
1 bed flat (51) SR	7,548.00 m <sup>2</sup>	938.00 pm <sup>2</sup>	7,080,024	
2 bed house (83) SR	6,142.00 m <sup>2</sup>	753.50 pm <sup>2</sup>	4,627,997	
3 bed house (94) SR	2,444.00 m <sup>2</sup>	753.50 pm <sup>2</sup>	1,841,554	
4 bed house (110) SR	2,860.00 m <sup>2</sup>	753.50 pm <sup>2</sup>	2,155,010	
2 bed house (68) LCHO	5,032.00 m <sup>2</sup>	753.50 pm <sup>2</sup>	3,791,612	
3 bed house (78) LCHO	<u>1,716.00 m<sup>2</sup></u>	753.50 pm <sup>2</sup>	<u>1,293,006</u>	
<b>Totals</b>	<b>177,886.00 m<sup>2</sup></b>		<b>135,429,707</b>	<b>135,429,707</b>
Contingency		2.50%	3,385,743	3,385,743
<b>Other Construction</b>				
External allowances		20.00%	27,085,941	27,085,941
<b>PROFESSIONAL FEES</b>				
Other Professionals (OMH)		8.00%	9,171,240	
Other Professionals (AFH)		8.00%	1,663,136	10,834,377
<b>MARKETING &amp; LETTING</b>				
Sales, marketing & legals (OMH)		3.00%	8,080,800	
Sales, marketing & legals (AFH)		1.50%	326,280	8,407,080
<b>FINANCE</b>				
Debit Rate 6.000% Credit Rate 5.200% (Nominal)				
Total Finance Cost				8,574,109
<b>TOTAL COSTS</b>				<b>239,975,582</b>

**APPRAISAL SUMMARY****VALUATION OFFICE AGENCY**

DVS re 1850 unit Strategic site  
Externals to 20%-No s106-No Abnormals  
PROFIT

51,136,408

**Performance Measures**

Profit on Cost%	21.31%
Profit on GDV%	17.57%
Profit on NDV%	17.57%
IRR	11.70%
Profit Erosion (finance rate 6.000%)	3 yrs 3 mths



# Valuation Office Agency

## Development Appraisal

Sheltered housing (for the Elderly) scheme

Higher sales scheme- Zone 3

Report Date: 23 October 2013

**APPRAISAL SUMMARY****VALUATION OFFICE AGENCY****Sheltered housing (for the Elderly) scheme  
Higher sales scheme- Zone 3****Summary Appraisal for Merged Phases 1 2**

Currency in £

**REVENUE****Sales Valuation**

	<b>Units</b>	<b>m<sup>2</sup></b>	<b>Rate m<sup>2</sup></b>	<b>Unit Price</b>	<b>Gross Sales</b>	<b>Adjustment</b>	<b>Net Sales</b>
1 Bed (49) Sheltered unit	16	784.00	3,500.00	171,500	2,744,000	0	2,744,000
2 Bed (65) Sheltered unit	16	1,041.60	3,500.00	227,850	3,645,600	0	3,645,600
1Bed flat (51) SR	6	254.99	844.27	35,880	215,280	0	215,280
2 Bed flat (68) LCHO	<u>2</u>	<u>113.33</u>	2,750.00	155,827	<u>311,654</u>	<u>(93,496)</u>	<u>218,158</u>
<b>Totals</b>	<b>40</b>	<b>2,193.92</b>			<b>6,916,534</b>	<b>(93,496)</b>	<b>6,823,038</b>

**Rental Area Summary**

	<b>Units</b>	<b>Initial MRV/Unit</b>	<b>Net Rent at Sale</b>	<b>Initial MRV</b>
Ground Rent on 1 bed sheltered	16	425	6,800	6,800
Ground Rent on 2 bed sheltered	16	495	7,920	7,920
Ground Rent on 1 bed SR	6	425	2,550	2,550
Ground Rent on 2 bed LCHO	2	495	990	990
<b>Totals</b>	<b>40</b>		<b>18,260</b>	<b>18,260</b>

**Investment Valuation****Ground Rent on 1 bed sheltered**

Market Rent	6,800	YP @	6.0000%	16.6667	
		PV 1yr 2mths @	6.0000%	0.9343	105,885

**Ground Rent on 2 bed sheltered**

Market Rent	7,920	YP @	6.0000%	16.6667	
		PV 1yr 2mths @	6.0000%	0.9343	123,325

**Ground Rent on 1 bed SR**

Market Rent	2,550	YP @	6.0000%	16.6667	
		PV 1yr 2mths @	6.0000%	0.9343	39,707

**Ground Rent on 2 bed LCHO**

Market Rent	990	YP @	6.0000%	16.6667	
		PV 1yr 2mths @	6.0000%	0.9343	15,416

**APPRAISAL SUMMARY****VALUATION OFFICE AGENCY**

Sheltered housing (for the Elderly) scheme  
Higher sales scheme- Zone 3

284,332

**GROSS DEVELOPMENT VALUE** 7,107,370

**NET REALISATION** 7,107,370

**OUTLAY****ACQUISITION COSTS**

Residualised Price (0.40 Ha 2,893,700.74 pHect) 1,157,480  
1,157,480

**Other Acquisition**

Land cost benchmark 197,680  
SDLT 1.00% 1,977  
Agent 0.75% 1,483  
Legals 0.75% 1,483  
202,622

**CONSTRUCTION COSTS**

Construction	Units	Unit Amount	Cost
Ground Rent on 1 bed sheltered	16 un	1,800	28,800
Ground Rent on 2 bed sheltered	16 un	1,800	28,800
Ground Rent on 1 bed SR	6 un	1,800	10,800
Ground Rent on 2 bed LCHO	<u>2 un</u>	1,800	<u>3,600</u>
<b>Totals</b>			<b>72,000</b>

	m <sup>2</sup>	Rate m <sup>2</sup>	Cost
1 Bed (49) Sheltered unit	1,120.00 m <sup>2</sup>	1,001.00 pm <sup>2</sup>	1,121,120
2 Bed (65) Sheltered unit	1,488.00 m <sup>2</sup>	1,001.00 pm <sup>2</sup>	1,489,488
1Bed flat (51) SR	306.00 m <sup>2</sup>	938.00 pm <sup>2</sup>	287,028
2 Bed flat (68) LCHO	<u>136.00 m<sup>2</sup></u>	938.00 pm <sup>2</sup>	<u>127,568</u>
<b>Totals</b>	<b>3,050.00 m<sup>2</sup></b>		<b>3,025,204</b>

3,097,204

Contingency 2.50% 77,430  
77,430

**APPRAISAL SUMMARY****VALUATION OFFICE AGENCY****Sheltered housing (for the Elderly) scheme****Higher sales scheme- Zone 3****Other Construction**

External works & Sustainability	10.00%	153,572	153,572
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**PROFESSIONAL FEES**

Architect	8.00%	260,062	260,062
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**DISPOSAL FEES**

Sales & marketings costs	5.00%	333,697	
Sales & marketing (affordable)	0.50%	2,167	
Sales Legal Fee	40.00 un	600.00 /un	24,000
			359,864

**FINANCE**

Debit Rate 7.000% Credit Rate 2.000% (Nominal)			
Total Finance Cost			428,641

**TOTAL COSTS****5,736,875****PROFIT****1,370,495****Performance Measures**

Profit on Cost%	23.89%
Profit on GDV%	19.28%
Profit on NDV%	19.28%
Development Yield% (on Rent)	0.32%
Equivalent Yield% (Nominal)	6.00%
Equivalent Yield% (True)	6.23%
IRR	21.31%
Rent Cover	75 yrs 1 mth
Profit Erosion (finance rate 7.000%)	3 yrs 1 mth

**APPRAISAL SUMMARY****VALUATION OFFICE AGENCY**

Sheltered housing (for the Elderly) scheme  
Higher sales scheme- Zone 3

# Valuation Office Agency

## Development Appraisal

Sheltered housing (for the Elderly) scheme

Lower sales scheme- Zone 3

Report Date: 23 October 2013

**APPRAISAL SUMMARY****VALUATION OFFICE AGENCY****Sheltered housing (for the Elderly) scheme  
Lower sales scheme- Zone 3****Summary Appraisal for Merged Phases 1 2**

Currency in £

**REVENUE****Sales Valuation**

	<b>Units</b>	<b>m<sup>2</sup></b>	<b>Rate m<sup>2</sup></b>	<b>Unit Price</b>	<b>Gross Sales</b>	<b>Adjustment</b>	<b>Net Sales</b>
1 Bed (49) Sheltered unit	16	784.00	3,000.00	147,000	2,352,000	0	2,352,000
2 Bed (65) Sheltered unit	16	1,041.60	3,000.00	195,300	3,124,800	0	3,124,800
1Bed flat (51) SR	6	254.99	844.27	35,880	215,280	0	215,280
2 Bed flat (68) LCHO	<u>2</u>	<u>113.33</u>	2,750.00	155,827	<u>311,654</u>	<u>(93,496)</u>	<u>218,158</u>
<b>Totals</b>	<b>40</b>	<b>2,193.92</b>			<b>6,003,734</b>	<b>(93,496)</b>	<b>5,910,238</b>

**Rental Area Summary**

	<b>Units</b>	<b>Initial MRV/Unit</b>	<b>Net Rent at Sale</b>	<b>Initial MRV</b>
Ground Rent on 1 bed sheltered	16	425	6,800	6,800
Ground Rent on 2 bed sheltered	16	495	7,920	7,920
Ground Rent on 1 bed SR	6	425	2,550	2,550
Ground Rent on 2 bed LCHO	2	495	990	990
<b>Totals</b>	<b>40</b>		<b>18,260</b>	<b>18,260</b>

**Investment Valuation****Ground Rent on 1 bed sheltered**

Market Rent	6,800	YP @	6.0000%	16.6667	
		PV 1yr 2mths @	6.0000%	0.9343	105,885

**Ground Rent on 2 bed sheltered**

Market Rent	7,920	YP @	6.0000%	16.6667	
		PV 1yr 2mths @	6.0000%	0.9343	123,325

**Ground Rent on 1 bed SR**

Market Rent	2,550	YP @	6.0000%	16.6667	
		PV 1yr 2mths @	6.0000%	0.9343	39,707

**Ground Rent on 2 bed LCHO**

Market Rent	990	YP @	6.0000%	16.6667	
		PV 1yr 2mths @	6.0000%	0.9343	15,416

**APPRAISAL SUMMARY****VALUATION OFFICE AGENCY**

Sheltered housing (for the Elderly) scheme  
Lower sales scheme- Zone 3

284,332

**GROSS DEVELOPMENT VALUE**

6,194,570

**NET REALISATION**

6,194,570

**OUTLAY****ACQUISITION COSTS**

Residualised Price (0.40 Ha 1,418,924.34 pHect)

567,570

567,570

**Other Acquisition**

Land cost benchmark

197,680

SDLT

1.00%

1,977

Agent

0.75%

1,483

Legals

0.75%

1,483

202,622

**CONSTRUCTION COSTS****Construction****Units****Unit Amount****Cost**

Ground Rent on 1 bed sheltered

16 un

1,800

28,800

Ground Rent on 2 bed sheltered

16 un

1,800

28,800

Ground Rent on 1 bed SR

6 un

1,800

10,800

Ground Rent on 2 bed LCHO

2 un

1,800

3,600**Totals****72,000****m<sup>2</sup>****Rate m<sup>2</sup>****Cost**

1 Bed (49) Sheltered unit

1,120.00 m<sup>2</sup>1,001.00 pm<sup>2</sup>

1,121,120

2 Bed (65) Sheltered unit

1,488.00 m<sup>2</sup>1,001.00 pm<sup>2</sup>

1,489,488

1Bed flat (51) SR

306.00 m<sup>2</sup>938.00 pm<sup>2</sup>

287,028

2 Bed flat (68) LCHO

136.00 m<sup>2</sup>938.00 pm<sup>2</sup>127,568**Totals****3,050.00 m<sup>2</sup>****3,025,204****3,097,204**

Contingency

2.50%

77,430

77,430

**APPRAISAL SUMMARY****VALUATION OFFICE AGENCY****Sheltered housing (for the Elderly) scheme****Lower sales scheme- Zone 3****Other Construction**

External works & Sustainability	10.00%	153,572	153,572
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**PROFESSIONAL FEES**

Architect	8.00%	260,062	260,062
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**DISPOSAL FEES**

Sales & marketings costs	5.00%	288,057	
Sales & marketing (affordable)	0.50%	2,167	
Sales Legal Fee	40.00 un	600.00 /un	24,000
			314,224

**FINANCE**

Debit Rate 7.000% Credit Rate 2.000% (Nominal)			
Total Finance Cost			333,952

**TOTAL COSTS****5,006,635****PROFIT****1,187,935****Performance Measures**

Profit on Cost%	23.73%
Profit on GDV%	19.18%
Profit on NDV%	19.18%
Development Yield% (on Rent)	0.36%
Equivalent Yield% (Nominal)	6.00%
Equivalent Yield% (True)	6.23%
IRR	22.73%
Rent Cover	65 yrs 1 mth
Profit Erosion (finance rate 7.000%)	3 yrs 1 mth

**APPRAISAL SUMMARY****VALUATION OFFICE AGENCY**

Sheltered housing (for the Elderly) scheme  
Lower sales scheme- Zone 3

# Valuation Office Agency

## Development Appraisal

Sheltered housing (for the Elderly) scheme

Zone 2- Entry level sales scheme

Report Date: 23 October 2013

**APPRAISAL SUMMARY****VALUATION OFFICE AGENCY****Sheltered housing (for the Elderly) scheme  
Zone 2- Entry level sales scheme****Summary Appraisal for Merged Phases 1 2**

Currency in £

**REVENUE**

<b>Sales Valuation</b>	<b>Units</b>	<b>m<sup>2</sup></b>	<b>Rate m<sup>2</sup></b>	<b>Unit Price</b>	<b>Gross Sales</b>	<b>Adjustment</b>	<b>Net Sales</b>
1 Bed (49) Sheltered unit	16	784.00	2,750.00	134,750	2,156,000	0	2,156,000
2 Bed (65) Sheltered unit	16	1,041.60	2,750.00	179,025	2,864,400	0	2,864,400
1Bed flat (51) SR	6	254.99	844.27	35,880	215,280	0	215,280
2 Bed flat (68) LCHO	<u>2</u>	<u>113.33</u>	2,500.00	141,661	<u>283,322</u>	<u>(84,997)</u>	<u>198,325</u>
<b>Totals</b>	<b>40</b>	<b>2,193.92</b>			<b>5,519,002</b>	<b>(84,997)</b>	<b>5,434,005</b>

**Rental Area Summary**

	<b>Units</b>	<b>Initial MRV/Unit</b>	<b>Net Rent at Sale</b>	<b>Initial MRV</b>
Ground Rent on 1 bed sheltered	16	425	6,800	6,800
Ground Rent on 2 bed sheltered	16	495	7,920	7,920
Ground Rent on 1 bed SR	6	425	2,550	2,550
Ground Rent on 2 bed LCHO	2	495	990	990
<b>Totals</b>	<b>40</b>		<b>18,260</b>	<b>18,260</b>

**Investment Valuation****Ground Rent on 1 bed sheltered**

Market Rent	6,800	YP @	6.0000%	16.6667	
		PV 1yr 2mths @	6.0000%	0.9343	105,885

**Ground Rent on 2 bed sheltered**

Market Rent	7,920	YP @	6.0000%	16.6667	
		PV 1yr 2mths @	6.0000%	0.9343	123,325

**Ground Rent on 1 bed SR**

Market Rent	2,550	YP @	6.0000%	16.6667	
		PV 1yr 2mths @	6.0000%	0.9343	39,707

**Ground Rent on 2 bed LCHO**

Market Rent	990	YP @	6.0000%	16.6667	
		PV 1yr 2mths @	6.0000%	0.9343	15,416

**APPRAISAL SUMMARY****VALUATION OFFICE AGENCY**

Sheltered housing (for the Elderly) scheme  
Zone 2- Entry level sales scheme

284,332

**GROSS DEVELOPMENT VALUE**

5,718,338

**NET REALISATION**

5,718,338

**OUTLAY****ACQUISITION COSTS**

Residualised Price (0.40 Ha 639,224.35 pHect)

255,690

255,690

**Other Acquisition**

Land cost benchmark

197,680

SDLT

1.00%

1,977

Agent

0.75%

1,483

Legals

0.75%

1,483

202,622

**CONSTRUCTION COSTS****Construction****Units****Unit Amount****Cost**

Ground Rent on 1 bed sheltered

16 un

1,800

28,800

Ground Rent on 2 bed sheltered

16 un

1,800

28,800

Ground Rent on 1 bed SR

6 un

1,800

10,800

Ground Rent on 2 bed LCHO

2 un

1,800

3,600**Totals****72,000****m<sup>2</sup>****Rate m<sup>2</sup>****Cost**

1 Bed (49) Sheltered unit

1,120.00 m<sup>2</sup>1,001.00 pm<sup>2</sup>

1,121,120

2 Bed (65) Sheltered unit

1,488.00 m<sup>2</sup>1,001.00 pm<sup>2</sup>

1,489,488

1Bed flat (51) SR

306.00 m<sup>2</sup>938.00 pm<sup>2</sup>

287,028

2 Bed flat (68) LCHO

136.00 m<sup>2</sup>938.00 pm<sup>2</sup>127,568**Totals****3,050.00 m<sup>2</sup>****3,025,204****3,097,204**

Contingency

2.50%

77,430

77,430

**APPRAISAL SUMMARY****VALUATION OFFICE AGENCY****Sheltered housing (for the Elderly) scheme****Zone 2- Entry level sales scheme****Other Construction**

External works & Sustainability	10.00%	153,572	153,572
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**PROFESSIONAL FEES**

Architect	8.00%	260,062	260,062
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**DISPOSAL FEES**

Sales & marketings costs	5.00%	265,237	
Sales & marketing (affordable)	0.50%	2,068	
Sales Legal Fee	40.00 un	600.00 /un	24,000
			291,305

**FINANCE**

Debit Rate 7.000% Credit Rate 2.000% (Nominal)			
Total Finance Cost			283,425

**TOTAL COSTS****4,621,309****PROFIT****1,097,029****Performance Measures**

Profit on Cost%	23.74%
Profit on GDV%	19.18%
Profit on NDV%	19.18%
Development Yield% (on Rent)	0.40%
Equivalent Yield% (Nominal)	6.00%
Equivalent Yield% (True)	6.23%

IRR	23.96%
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Rent Cover	60 yrs 1 mth
Profit Erosion (finance rate 7.000%)	3 yrs 1 mth

**APPRAISAL SUMMARY****VALUATION OFFICE AGENCY**

Sheltered housing (for the Elderly) scheme  
Zone 2- Entry level sales scheme

Printed: 30/10/2013

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S
Site	Site area (acres)	GDV	GDC (including Land & Profit but net CIL)	Total units	% AFH	Total square feet (GIA/ EFA)	Sqft built per net acre	Dwellings per hectare	Average (OMH & AFH) £s per sqft	\$106 Costs	Benchmark Land value (Reflecting vendor incentive)	BMLV- £s per ACRE	BMLV- % of GDV	Residualised value for CIL	CIL Residual- £s per square METRE	DVS CIL rate, AFTER Savills 30% buffer, expressed in £s per square METRE	RCT draft CIL rate- £s per SQM	RCT CIL as % of development cost
Appendix J- Zone 3 (Higher sales) Sheltered housing scheme- 40 units	0.99	£7,107,370	£5,949,890	40	20%	32,831	33,216	100.00	£216	Zero	£197,680	£200,000	2.8%	£1,157,480	£379.50	£265.65	£85.00	4.36%
Appendix K- Zone 3 (Lower sales) Sheltered housing scheme- 40 units	0.99	£6,194,570	£5,627,000	40	20%	32,831	33,216	100.00	£189	Zero	£197,680	£200,000	3.2%	£567,570	£186.09	£130.26	£85.00	4.61%
Appendix L- Zone 2 (Entry level Sales) Sheltered housing scheme- 40 units	0.99	£5,718,338	£5,462,648	40	20%	32,831	33,216	100.00	£174	Zero	£197,680	£200,000	3.5%	£255,690	£83.83	£58.68	£40.00	2.23%

Appendix 10: Record of Section 106 Agreements

## List of Section 106 Agreements resolved to approve but not signed since March 2011

### Notes

1. Table is correct at 23 October 2013.
2. It is not possible to assign a cost to all obligations and these are shown as 'site specific costs'
3. Affordable housing contributions are secured in a range of different ways (on-site/off-site, low cost/social rented). The values shown in the table are the cost to the developer of providing the affordable housing package relevant to the individual scheme.
4. The costs shown against the affordable housing contributions were calculated using Oct 2013 costs.
5. This table only includes S106 related to sites which would be liable for CIL in Zones 1, 2, and 3.

23<sup>rd</sup> October 2013

Ref	App No.	App Type	Committee Date	Status	Address	Proposal	S106 Requirement	No. of Affordable Units	Value
<b>1</b>	10/0845/34	Hybrid	10/11/2011	Not signed	Llanilid OCS	Comprehensive development (including up to 1,850 dwellings)	Primary school		<b>£8,780,000 - £10,000,000</b>
							Secondary school		<b>£2,000,000</b>
							Transport Tariff		<b>£5,063,968</b>
							Leisure/Recreation contribution		<b>£2,700,00</b>
							Ecology Biodiversity contribution		<b>Site specific costs</b>
							Affordable housing 10% minimum (185 units) and a reappraisal mechanism	185	<b>£11,650,886</b>
<b>2</b>	11/1286/10	Full	16/02/2012	Not signed	Llantrisant School, School St, Llantrisant	8 flats & 2 dwellings	10% affordable housing	1	<b>£72,000</b>
<b>3</b>	10/0715/13	Outline	04/10/2012	Not signed	Hillside Country Club, Llantrisant Rd,	Residential development (outline)	Transport tariff		<b>£99,264</b>

					Tonyrefail				
						(34 dwellings indicated in report)	Leisure/Recreation contribution		<b>Site specific costs</b>
							20% affordable housing	6	<b>£321,440</b>
<b>4</b>	10/0405/13	Outline	21/02/2013	Not signed	Gene Metal Scrapyard, Kingsland Ter, Treforest	Residential use	20% affordable housing	5	<b>£282,872</b>
						(27 dwellings indicated)	Leisure facilities.		<b>£27,000</b>
							Transport tariff		<b>£73,696</b>
<b>5</b>	11/1330/13	Outline	28/02/2013	Not signed	Adj. Cowbridge Road and A473, Talbot Green	New Town Centre (including 64 dwellings, 52,463 sq m commercial, cinema, hotel & PFS)	Transportation		<b>£4,100,000</b>
							20% affordable housing	13	<b>£768,000</b>
							Education payment		<b>£559,000</b>
							On-site play areas or payment of £64,000 for off-site play areas		<b>£64,000</b>
							Ecology		<b>£255,000</b>

							Retail impact		<b>£150,000</b>
							Flood bank monitoring		<b>Site specific costs</b>
<b>6</b>	12/0862	Full	01/08/2013	Not signed	Land adjacent Llantrisant Road, Bedddau	Demolition of farmhouse and residential development 142 dwellings	Education.		<b>£155,000</b>
							Transport Tariff		<b>£372,240</b>
							Traffic Regulation Order		<b>£5,000</b>
							Road safety scheme		<b>£20,000</b>
							15% affordable units and a re-appraisal mechanism	21	<b>£633,310</b>
							Habitat management plan		<b>Site specific costs</b>
<b>7</b>	13/548	Full	05/09/2013	Not signed	Land off Queensway, Nantgarw	Construction of 5 dwellings	Transport tariff		<b>£15,040</b>
							Open Space		<b>£5,000</b>
							20% affordable dwellings	1	<b>£42,000</b>

<b>8</b>	11/1459	Full	26/09/2013	Not signed	Ferraris Bakery and Co. Bryngelli Estate, Hirwaun	Demolish store and erect A1 foodstore, petrol station, highway works etc.	Transport Tariff		<b>£67,868</b>
				Referred to Welsh Government					
<b>9</b>	12/0183	Outline	26/09/2013	Not signed	Land South of Hirwaun	A1 retail store, parking etc.	Transport Tariff		<b>£140,718</b>
				Referred to Welsh Government			Ecological enhancement plan and management for 25 years		<b>Site specific costs</b>
<b>10</b>	12/0637	Outline	26/09/2013	Not signed	Robertstown Indus Estate, Aberdare	Demolish retail unit and new A1 retail unit with Flood works, petrol filling station and car park	Transport Tariff		<b>£606,815</b>
				Referred to Welsh Government					

## List of Section 106 Agreements Signed since March 2011

### Notes

1. Table is correct at 23 October 2013.
2. It is not possible to assign a cost to all obligations and these are shown as 'site specific costs'
3. Affordable housing contributions are secured in a range of different ways (on-site/off-site, low cost/social rented). The values shown in the table are the cost to the developer of providing the affordable housing package relevant to the individual scheme.
4. The costs shown against the affordable housing contributions were calculated using Oct 2013 costs.
5. This table only includes S106 related to sites which would be liable for CIL in Zones 1, 2, and 3.

23<sup>rd</sup> October 2013

Reference	Application No.	Application Type	Date Signed	Address	Proposal	S106 Requirement	No. of Affordable Units	£
<b>1</b>	09/0730/10	Full	14/03/2012	Land West of Llechau Farm, Llanharry	Construction of 88 dwellings, roads, sewers and associated works	Education		<b>£245,820</b>
						Transportation tariff		<b>£248,000</b>
						Public Open Space: Layout Public Open Space .		<b>Site specific costs</b>
						Long-term management of the public open space.		<b>Site specific costs</b>
						Ecological Mitigation Scheme		<b>Site specific costs</b>
						Management of the Ecological Mitigation Area		<b>Site specific costs</b>
						20% affordable housing	18	<b>£556,875</b>
<b>2</b>	10/0847/13	Outline	24/05/2012	Land off Tyla Gwyn/A468, Tyla Gwyn, Nantgarw	Erection of building for Mixed Use Classes A3 (Food & Drink) & C1 (Hotel) including associated external works (Outline)	Traffic Management Contribution		<b>£6,000</b>

						Transportation tariff		<b>£70,000</b>
<b>3</b>	08/0438/13	Outline	13/11/2012	Western Power Distribution Site, Church Village	Residential Development (Outline)	Education Contribution		<b>£178,000</b>
				(80 dwellings indicated in report)		Public Transport		<b>£20,750</b>
						Air Quality Management Contribution		<b>£4,000</b>
						Community Facility		<b>£10,000</b>
						Affordable housing units (10%)	8	<b>£369,440</b>

<b>4</b>	10/1133/13	Outline	09/11/2012	Alexon House, Cardiff Road, Hawthorn, Pontypridd	Outline application for the demolition of existing buildings and redevelopment for residential use (60 units) with associated access and earthworks	Outdoor recreation and play facilities		<b>£79,000</b>
						Public transport		<b>£18,000</b>
				(reserved matters application 79 dwellings ref. 13/0289)		20% affordable housing	16	<b>£911,096</b>
<b>5</b>	10/1084/10	Full	23/07/2013	Leeway Carpets & Flooring Ltd, Llantrisant Rd, Penycoedcae	Residential development (6 dwellings)	20% affordable housing.	1	<b>£37,500.00</b>
<b>6</b>	11/0996/13	Outline	22/03/2013	Land adj The Meadows, Coedely, Tonyrefail	Residential development (outline)	Minimum £800,000 for: Transport tariff; Education; Leisure/Recreation.		<b>£800,000</b>
						10% affordable housing and a re-appraisal mechanism	13	<b>£658,980</b>

<b>7</b>	11/1001/10	Full	22/03/2013	Phase 1, The Greens, Coedely, Tonyrefail	Residential development	Transport tariff		<b>tied-in with 11/996</b>
	(this is part of outline S.106 11/0996 and cannot be calculated separately)					Education contribution		<b>tied-in with 11/996</b>
						Leisure/Recreation contribution.		<b>tied-in with 11/996</b>
<b>8</b>	07/0938/13	Outline	19/06/2013	Fire Service HQ, Lanelay Hall, Talbot Green	Residential development	Education contribution		<b>£400,000</b>
						10% affordable housing units and a re-appraisal mechanism	12	<b>£554,160</b>
						Provision, management & maintenance of on-site POS & trees.		<b>Site specific costs</b>
						Acoustic barrier provision & maintenance		<b>Site specific costs</b>
						Replacement waste water storage tanks.		<b>Site specific costs</b>

						Traffic Management Contribution		<b>£70,000</b>
<b>9</b>	10/1027	Outline	22/05/2013	Land adjoining Ffordd, Y Bedol, Coed Y Cwm, Pontypridd	Residential Development	Transport tariff		<b>£63,168</b>
					(21 dwellings indicated)	Public open space		<b>£17,136,36</b>
						10% affordable housing	2	<b>£72,000</b>
<b>10</b>	12/0924	Full	03/07/2013	The Hollybush, Ty Mawr Road, Pontypridd	Demolition of building and construction of 8 affordable units	Traffic Order		<b>£5,000</b>
						Registered Social Landlord scheme		<b>£0</b>
<b>11</b>	12/1317	Full	unilateral undertaking 05/09/13	Block D, Coed-Y-Lan Com, Griagwen, Pontypridd	c.o.u. and conversion to 22 flats	Traffic Regulation Order		<b>£5,000</b>