Community Infrastructure Levy (CIL) Draft Charging Schedule: public consultation

Respondent Details

Contact Details	
Name	Mr Schmull
Email	[redacted]

Part A: personal / organisation details

Q1. Are you completing this form as:

an agent

Q2. Please use the form below to provide your name and address and contact details.

Title	Mr
Full Name	Andrew Herridge
Organisation (if relevant)	Herridge Property Consulting
Organisation representing (if relevant)	Arnold White Estates Group
Job title (if relevant)	-
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Postcode	EX1 1QT
Telephone number	[redacted]
Email address	[redacted]

Part B: your comments

You can provide your comments on the Community Infrastructure Levy (CIL) Draft Charging Schedule and its associated Evidence Documents in this section. The documents you can comment on are listed below and all are available to download and view on our website: Draft CIL Charging Schedule, January 2021 CIL Viability Assessment, April 2019 CIL Viability Assessment Addendum, August 2020 CIL Viability Assessment Executive Summary, October 2020 Infrastructure Funding Gap Statement, January 2021 If you wish to provide comments on more than one page or paragraph, or more than one document, you will be given the option once you have completed this section. Please select the document you wish to comment on using the drop-down menu below:

CIL Viability Assessment Executive Summary, October 2020

Q3. Which page or paragraph number are you commenting on?

The comments are referenced to the paragraph numbers and section headings in the Viability Assessment ES and where referred to, the CIL Draft Charging Schedule in the comments Section 4. below.

Q4. Please provide your comments in the box below.You will also be able to upload any supporting documents using the button below.

The representations and comments in the paragraphs below relate to the Aspinall Verdi (AV) Local Plan and CIL Viability Assessments particularly the Executive Summary report, October 2020 (VAES) and the CIL Charging Rates published by the Vale of White Horse District Council (VWHDC) in a Community Infrastructure (CIL) Draft Charging Schedule dated January 2021 (CILDCS). The proposed charging rates are summarised at paragraph 6.2 Table 1 of the schedule.

The comments are referenced to the paragraph numbers and section headings in the VAES and where referred to, the CILDCS.

Development Appraisal Assumptions
General Comments Residential Development Project Timescale
No VAES paragraph reference

A fundamental requirement for assessing the reliability of the results produced from development viability modelling for CIL charging purposes, is to set out in detail the assumptions used for the various site typologies. Assumptions have been made for the various input variables to the viabilities, however the assumptions used for the project timescales for the various site typologies which have been modelled are not clear. The assumptions adopted for the timescale of the construction period as a whole, the period for initial infrastructure provision, the period to first dwelling completions and initial sales, the assumed sales rate for the development for both market sales and affordable housing and so on have a significant bearing on the viability modelling results and the recommended CIL charging rates. If the project timescales used are consistently significantly over optimistic or assume a "best-case" scenario at all times, the results and draft charging rates produced will be unreliable and should be reviewed.

It does not appear to be clear what development project timescales have been used, therefore it is not possible to establish whether these are realistic and accurately reflect the "real world" time periods for on-site delivery of residential projects particularly large major projects. These schemes will have significant initial costs for on and off-site infrastructure provision before any houses can be built and then sold and the sales income stream from the development received. The cash flow implications for expenditure and income and the interest costs associated with it (see finance rate costs below) have critical implications for the financial returns on capital invested for a project, the profit levels achieved and amongst other matters the CIL Charges which can be afforded whilst retaining viability. Full details of this information should be provided to enable the viability modelling results to be fully assessed against all relevant information and a fully informed judgement made as to whether this is robust and sufficiently reliable evidence for CIL rate setting.

Residential Assumptions
Section 5 page 9

This Section sets out the assumptions made in assessing the residential housing market and the housing

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market research (HMR) undertaken to arrive at an assessment of projected sales values. VA have adopted (para’s 5.2/3) what they describe as a "business as normal approach" for both the economic consequences for the housing market of the Covid-19 pandemic and similarly for any potential consequences for the market of Brexit. This is an optimistic and bullish approach under the circumstances which carries a high degree of risk especially for the purpose of CIL viability and rate setting which will apply for a lengthy period into the future. We would have expected some caution as we refer to in our conclusions and amongst other matters it highlights the importance of an appropriate "buffer" see below.

In short, the HMR was interpreted to arrive at a division of the District between two areas either side of the A34. A high value area to the east and low value area to the west. The difference in geographical area is significant, the lower value area covers most of the District, the higher value area is a narrower ribbon area of the District running north - south on the eastern edge with adjacent Authorities, VAES Figure 5.3.

The HMR was then used to arrive at an assessment of market sales values for 7 individual dwelling types ranging from a 1 bed flat to a 5 bed house. These values were established by using a generic Land Registry index increase of 2% on the Land Registry data which was used in the initial Viability Assessment report in 2019 and an analysis of "asking prices" for several recent developments. The indexed 2019 values are summarised at para 5.15, Table 5.4 of the VAES.

Rather than simply indexing previous data or looking at "asking prices" which is not sales price evidence and therefore unreliable. It would have been more realistic to have obtained for the VAES and maintained for the whole assessment period 2019-October 2020 a comprehensive ongoing data base comprising a detailed comparable analysis of all new build dwelling sales in the area. This could have been obtained direct from market research with housebuilders and supplemented/cross referenced with Land Registry data for actual new dwelling sales over the relevant period, rather using an index to uplift the figures. This would represent the most recently available and therefor reliable sales evidence for use in the appraisals and CIL charging rate setting.

This analysis of actual sales should be carried out to ensure a robust evidence base by comparison with an across the board set of indexed figures following which table 5.4 in the VAES should be revised and used as the basis for the viability appraisal modelling to be undertaken again. This would be more robust and give confidence that one of the three principle variables of a viability assessment has been rigorously researched and tested because even minor changes to this principle variable can significantly affect the results produced. This in turn could reveal that the results of the initial modelling was inaccurate and unsafe as the basis for recommending CIL charging rates which would undermine the validity of the rates set out in the CILDCS.

Residential Values - Affordable Housing
Paragraph 5.16

The Council provided AV with affordable housing mix and transfer values for the viability assessment modelling. These figures are represented as percentages of open market sales values, 60% for Affordable Rent dwellings and 76% for Intermediate tenure dwellings.

The figures produced by these percentages are higher than current affordable housing sales premiums being achieved in the market by housebuilders for s106 restricted affordable housing. These would be realistically represented at c.45-50% of open market sales value for Affordable Rent and c.65-70% of open market sales value for intermediate tenure dwellings.

Viability testing, as set out in the guidance PPG CIL, states that affording house values used to underpin the Draft Charging Schedule should be based on appropriate available evidence. There does not appear to be any available evidence which has been used in the VAES to justify the affordable housing values which have been applied to the viability appraisals.

Appropriate comparable evidence of affordable housing premiums/transfer values would have been available for use from several sources including housebuilders, Registered Providers and specialist agents/surveyors advising on the sale and acquisition of s106 affordable housing for housebuilders and RP’s. Actual transactional evidence could have been secured and included in the VAES to inform and justify the affordable housing values adopted in the appraisals.

Q4. Please provide your comments in the box below.You will also be able to upload any supporting documents using the button below.

Consequently, the values used are generalised percentage assumptions and cannot be considered reliable for use in CIL viability modelling. There is a significant risk that the values used in the different site appraisals will produce unreliable overstated results as they are not based on available current evidence. The different site typology viabilities should be reappraised based on reliable evidence as described.

Build Costs – Estate Housing
Table at Paragraph 5.23

The build costs used in the VAES for estate housing for appraising the two site typologies of 100 units or over is BCIS lower quartile (rather than median). This is not usual best practice for assessing scheme viability, for CIL rate setting. We would have expected BCIS median quartile cost figures to have been used to reflect the geographical location where build costs are generally higher than in other parts of the country. The residential cost assumptions section at paragraph 5.23 does not provide any explanation or evidence to justify using lower costs figures on sites of over 100 units. This is a low unit number threshold to apply the reduced lower quartile rate which will have the effect of overstating the viability results which is being used to support significantly higher proposed CIL charging rates.

All the viability modelling should be re-appraised based on BCIS median build cost rates to correct this issue.

Provision of Services and Infrastructure
Table at Paragraph 5.23

The viability modelling provides allowances for Strategic infrastructure based on costs which VA have prior agreed with the Council. However, this allowance is restricted only to the strategic sites.

The VAES viability modelling does not make any allowance for the provision of site servicing and other infrastructure costs in the appraisals of the site typologies. The costs used are limited to base unit construction costs for estate type housing (lower quartile for larger sites when it should be mean) and external works at 15% (which is agreed), which are described in the table as "generic on-plot costs including inter alia: estate roads, pavements, street-lights, utilities, drainage etc" plus a limited contingency of 3% in our view as explained below is insufficient, particularly for larger sites with more than a year's construction period.

We would have expected an allowance to have been included for all sites for servicing and infrastructure costs in addition to the "on-plot" base build and externals costs (as described in the VAES) where the total site area (gross area) is greater than the area on which the residential development is constructed i.e. the "on-plot" area and external estate roads, pavements etc which is known as the net developable area.

These costs include site wide engineering and regrading works (cut and fill), utility and drainage upgrades, distributor roads with no frontage residential development and so on. These works are in addition to "on plot build abnormal" costs for items such as specific foundation design costs over standard strip. These costs will increase in the coming years because of requirements such as Bio-Diversity Net Gain, phosphates mitigation and others. The VAES allows for contribution estimates of less than £1,000 per unit based on a DEFRA report from 2019 which is inadequate. The individual site typologies which have been modelled assuming a gross to net ratio, this has serious limitations per se as a generalised deduction, however it is acknowledged that assumptions must be made for a District wide assessment. The difficulty with looking back to the recent past and development currently under construction in setting future rates/policy is it is difficult to provide for changes which occur in the future and the impact is exacerbated during periods of significant changes.

The planning system and its requirements with the consequent costs for residential development changes regularly. However, the forthcoming period will experience unprecedented change by comparison with recent years and this can be envisaged now with focus on the environment, climate change, construction methods, design standards and so on. One example will be the amount of greenfield land necessary to deliver the same number of houses per hectare as today will increase substantially during the period which the reviewed CIL Charging Schedule will apply.

It is imperative therefore that sufficient cost allowances for these items are included in the viability modelling. Otherwise, the construction costs side of the appraisals will be significantly underestimated,

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and this will mean the results from the modelling particularly for the larger sites over 50 dwellings cannot be relied on as robust for recommending new CIL Charging Rates. The viability modelling should be re-tested, and the necessary changes made which will impact the levy rates proposed in the CILDCS.

Assessment of Dwelling Unit Sizes

The viability reports confirm that National Described Space Standards (NDSS) floor areas were used for the viability modelling which were cross referenced with the EPC records from Land Registry property transactions. We are not convinced of the relevance of cross referencing with EPC's as we understand these are not assessed on the same basis.

NDSS do not include garages which are provided with all 4 and 5 bedroom dwellings some with double garages, (a percentage allowance should be included based on a review of current schemes) and a significant proportion (50-60%) of 3 bedroom dwellings. It is necessary for developers to provide garages with these unit types to meet purchaser expectations and achieve expected sales revenues. The sales revenue evidence for these unit types will have included garages with the relevant dwelling types. However, the cost of these over base BCIS has not been accounted for in the viability modelling as described above under build costs. Also, it has not been considered in an assessment of the impact of the liability of CIL on future new housing development as garages are included in the calculation of gross internal Area for the CIL liability calculations of a scheme.

This needs to be corrected as the current results of the viability modelling do not reflect the full weight of development cost and are not a robust evidence base to underpin the proposed new CIL charging rates. The viability modelling should be retested to establish the financial implications for CIL rate setting

Contingency
Table at Paragraph 5.23

The VAS confirms that a contingency has been applied of 3%. This is insufficient and is not an accurate reflection of the risks associated with build costs. It is imperative to allow an appropriate level of contingency especially for site typologies with construction period of 12 moth or more. Cost over runs can occur for many reasons including, regular multi week weather related delays, measured as built quantities can vary from budget costing/tender prices, risk items such as archaeology, ecology, ground conditions, supply chain problems and so on can add 5% or more.

We would have expected to see 5% used for all site typologies with over 12 month construction periods. A realistic understanding of costs is essential to the proper assessment of viability in an area. Therefore, all site typologies should re-appraised at 5% contingency to establish the implications of applying this realistic contingency for setting CIL charge rates.

Professional Fees
Table at paragraph 5.23

The VAES uses a rate of 6.5% for construction related professional fees, plus statutory planning application fee, and 3 times the application fee for the costs associated with the cost of planning application professional fees, surveys, and reports.

This significantly underestimates the costs associated with construction professional fees which should be a minimum of 10% and greater than that for the larger site typologies used. Similarly, 3 times the application fee for planning costs is again a significant underestimate for these costs particularly for the larger site typologies tested. Professional fees rates should be increased to a minimum of 10% of development costs and all site typologies should re-appraised on this basis to establish the implications of applying a realistic allowance for construction professional fees for setting CIL charge rates.

Site Specific S106/S278 Costs
Table at Paragraph 5.23 and 5.27

VAES Paragraph 5.27 states that the S106/S278 cost allowances have been updated and adjusted to include education contributions. It does not provide a calculation to explain the cost increase.

The CIL Draft Developer Contributions SPD, January 2021, makes it clear that residential schemes will now be liable for a wide range of additional highway, education and other s106 in addition to the liability

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for payment of a significantly increased CIL.

It is important that there is clarity as to how these costs will be calculated and applied which is not currently the case. It is not therefore possible to establish whether the additional s106 costs used in the viability modelling represent a realistic set of costs, when applied to individual schemes when planning applications are made. As indicated above a clear explanation should be provided to demonstrate how these costs for each item have been calculated and then applied to the viability modelling so it can be established whether these costs are justified and based on the most appropriate available evidence.

Finance Costs
Residential Cost Assumptions - Paragraph 5.23 Table 5.7

Table 5.7 of the VAS states that a 6.5% debit interest rate was used in the viability appraisals. The introduction paragraph 1.1 confirms that the VAES is the Executive Summary to the original 2019 CIL Viability and the 2020 Addendum, the latter has the viability appraisals as appendices.

There is a discrepancy between the finance interest rate noted at table 5.7 in the VAES (6.5%) and the finance interest rate applied to the viability appraisals which is 0.25% lower at 6.25%. This difference between the VAS and the appraisals will have a detrimental impact on the viability modelling results for the different site typologies selected, which at the lower finance rate will have produced inflated results. This difference will exacerbate the cash flow implications of the larger major residential projects which inherently involve greater risk because of their scale and the period over which they are built out.

We agree that 6.5% or more for the larger projects (not an average as stated in the VAES) is an acceptable rate for this purpose and is routinely used in current independent financial viability assessments for planning application purposes. The financial viability modelling of the site typologies should therefore be revisited using the 6.5% finance rate to ensure the results of the modelling are reliable which it is likely will require a downward revision of the CIL charging rates recommended and set out in Table 1 of the CILDCS.

A Viability Buffer in CIL Rate Setting

It is important that CIL Charging rates are not set at the maximum level which viability modelling can demonstrate, there should be a "buffer" or margin applied when setting rates to ensure the levy rate can support development when economic circumstances change.

The purpose is to ensure that the levy rate is flexible enough to maintain development viability and to prevent development/sites stalling and failure of the Local Plan to deliver due to market changes and to maintain the deliverability of a 5 -year housing land supply. The guidance also states that the charging Authority should be able to explain its approach clearly. This is particularly important now in a period of unprecedented economic uncertainty and recession which is expected to continue for several years presenting substantial risks for residential development viability.

The VAES indicates that the "buffer" from the maximum demonstrable CIL rate is variable across the different selected site typologies. However, contrary to the requirement of the PPG to explain the approach to the "buffer" clearly, it is not clear from the viability reports what "buffer" has been applied. This undermines the reliability of the viability modelling as a robust evidence base for CIL rate setting and the consequent reliability of the CIL charging rates proposed.

The CIL Examiner for the East Devon Council Draft CIL Charging Schedule, endorsed in June 2020 the 50% "buffer" adopted by the Council’s Consultants, Three Dragons, across all the different areas and site typologies in the District. The examiner confirmed this level of "buffer" is likely to ensure that a range of new residential development remains viable across the Authority area. This is consistent with the Reports of other CIL Examiner’s in the last 12 month period in other areas.

On this basis, and with the need to maintain scheme viability during uncertain economic times over the next few years it should be confirmed that a 50% "buffer from the maximum demonstrable rate has been applied to the viability modelling in this case and f this is not the case the viability modelling results should be re-assessed with a 50% buffer to allow for this.

Conclusion

Q4. Please provide your comments in the box below.You will also be able to upload any supporting documents using the button below.

In conclusion, for the reasons provided in the paragraphs above we are of the view that there are a number of significant limitations with viability evidence base produced by AV which has been used for setting the Draft CIL charging rates set out in Table 1 of the CILDCS.

These limitations significantly undermine the results of the viability modelling which given the potential implications for development viability and site deliverability should be reviewed. The viability appraisals must be robust for use as the basis for setting new CIL Charging Rates for residential development in the VWDC area given they will apply for a period of years without review. The impression is that a general "best case, business as usual scenario" has been taken maximising revenue projections and making insufficient allowance for the full burden of development costs which will be incurred in residential development.

As we have mentioned at various paragraphs in these comments, the importance of a robust evidence base is particularly critical for two additional reasons. Firstly, the increase in CIL charging rates for residential development which are being proposed are not insignificant, they represent a substantial increase in charging rates with the rate proposed for the Zone 1 Eastern Parishes area of the District doubling from the current indexed rate of £139.72 for 2021 to £280/m2 at a time of considerable economic uncertainty. This substantial increase is compounded by the expectation that s106 obligations will also increase substantially to include education, highways, and other obligations in addition to the doubling of CIL.

Secondly, VWHDC have made the decision to continue with a review which they commenced in 2019 during a period of unprecedented economic uncertainty caused by the Covid 19 Pandemic. The future economic impact of this on the economy and the residential housing market and consequently new development and site viability could be significant and currently difficult to predict based on the historic input data to the evidence base of recent years.

Therefore, we recommend the Council with their consultants consider the comments set out in the above paragraphs and review the viability appraisal modelling including the different individual site typologies adopted to address the issues raised. Following this the revised appraisal evidence should be published for additional consultation together with a revised schedule of proposed CIL charging rates reflecting the results of the reappraisal work.

Q5. Please upload any supporting documents below:

No Response

Comment again, or finish?

Q6. Would you like to make further comments on any of the consultation documents?

No, I'm ready to submit my comments now and finish the survey

Part B: your comments

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CIL Viability Assessment, April 2019

Q7. Which page or paragraph number are you commenting on?
No Response

Q8. Please provide your comments in the box below.You will also be able to upload any supporting documents using the button below.
No Response

Q9. Please upload any supporting documents below:
No Response

Comment again, or finish?

Q10. Would you like to make further comments on any of the consultation documents?
Yes, I'd like to make another comment

Part B: your comments

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CIL Viability Assessment Addendum, August 2020

Q11. Which page or paragraph number are you commenting on?
No Response

Q12. Please provide your comments in the box below.You will also be able to upload any supporting documents using the button below.
No Response

Q13. Please upload any supporting documents below:
No Response

Comment again, or finish?

Q14. Would you like to make further comments on any of the consultation documents?
Yes, I'd like to make another comment

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Infrastructure Funding Gap Statement, January 2021

Q15. Which page or paragraph number are you commenting on?
No Response

Q16. Please provide your comments in the box below.You will also be able to upload any supporting documents using the button below.
No Response

Q17. Please upload any supporting documents below:
No Response

Comment again, or finish?

Q18. Would you like to make further comments on any of the consultation documents?
No, I'm ready to submit my comments now and finish the survey

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No Response

Q19. Which page or paragraph number are you commenting on?
No Response

Q20. Please provide your comments in the box below.You will also be able to upload any supporting documents using the button below.
No Response

Q21. Please upload any supporting documents below:
No Response

Comment again, or finish?

Q22. Would you like to make further comments on any of the consultation documents?
No Response

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No Response

Q23. Which page or paragraph number are you commenting on?
No Response

Q24. Please provide your comments in the box below.You will also be able to upload any supporting documents using the button below.
No Response

Q25. Please upload any supporting documents below:
No Response

Comment again, or finish?

Q26. Would you like to make further comments on any of the consultation documents?
No Response

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No Response

Q27. Which page or paragraph number are you commenting on?

No Response

Q28. Please provide your comments in the box below.You will also be able to upload any supporting documents using the button below.

No Response

Q29. Please upload any supporting documents below:

No Response

Comment again, or finish?

Q30. Would you like to make further comments on any of the consultation documents?

No Response

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No Response

Q31. Which page or paragraph number are you commenting on?

No Response

Q32. Please provide your comments in the box below.You will also be able to upload any supporting documents using the button below.

No Response

Q33. Please upload any supporting documents below:

No Response

Comment again, or finish?

Q34. Would you like to make further comments on any of the consultation documents?

No Response

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No Response

Q35. Which page or paragraph number are you commenting on?

No Response

Q36. Please provide your comments in the box below.You will also be able to upload any supporting documents using the button below.

No Response

Q37. Please upload any supporting documents below:

No Response

Comment again, or finish?

Q38. Would you like to make further comments on any of the consultation documents?

No Response

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No Response

Q39. Which page or paragraph number are you commenting on?

No Response

Q40. Please provide your comments in the box below.You will also be able to upload any supporting documents using the button below.

No Response

Q41. Please upload any supporting documents below:

No Response

Participation at the independent examination

Q42. Participation at the Independent Examination of the Community Infrastructure Levy (CIL) Draft Charging ScheduleIn accordance with Regulation 21 of the Community Infrastructure Levy Regulations 2010, please indicate (by ticking the box below) whether you wish to be heard by the independent Examiner at the Examination of the Council’s Draft Charging Schedule.
Yes, I wish to be heard by the independent Examiner at the Examination

Further notification on progress

Q43. Further Notification on Progress with the Examination of the Community Infrastructure Levy (CIL) Draft Charging Schedule.In accordance with Regulation 16 of the Community Infrastructure Levy Regulations 2010, please indicate (by ticking the relevant box below) whether you wish to be notified by the council that:
The Draft Charging Schedule has been submitted to the Examiner
The recommendations of the Examiner (and the reasons for those recommendations) have been published
The Charging Schedule has been approved by Vale of White Horse District Council