

SUFFOLK COASTAL DISTRICT COUNCIL COMMUNITY INFRASTRUCTURE LEVY CHARGING SCHEDULE

Examiners Main Issues and Questions

Issue 1 – Legal and preliminary matters

- a) Does the Charging Schedule comply with the procedural requirements of the 2008 Planning Act and the 2010 Regulations as amended?
- b) Should the introduction of the Charging Schedule be delayed until the production of Suffolk Coastal District Council's Site Allocations Development Plan Document and/or a further review of the Council's Core Strategy?
- c) The Charging Schedule was published prior to publication of the Ministerial Written Statement on 28th November 2014 which states that affordable housing should not be sought on sites of 10 or less units. What are the implications of the Ministerial Statement for the Charging Schedule and the accompanying evidence base, including the Viability Assessment? ¹

Issue 2 – Is the Charging Schedule supported by appropriate available evidence?

- a) Is the Charging Schedule supported by appropriate available evidence on infrastructure requirements?
- b) Have the residential viability assumptions relating to the Code for Sustainable Homes (as set out in Table 5.1 of the Viability Study May 2014) been incorporated into the development appraisals in Appendix A of the Study? If not, what implications does this have for the evidence base and the Charging Schedule? ²
- c) Overall, have reasonable assumptions been made in relation to factors affecting viability of development and up to date evidence used? Including:
 - Sale prices/rental yield
 - Building costs
 - S.106/S.278 costs
 - Contingencies
 - Fees
 - Profit levels
 - Benchmark land values

¹ This question was raised by the Examiner in a letter to the Council dated 18 December 2014, and the Council's response can be viewed on the CIL Examination page on the Council's website.

² As for footnote 1.

- d) Should abnormal costs be included in the viability assessment?

Issue 3 – Are the proposed charging rates informed by and consistent with the evidence?

- a) Are the proposed charging rates for residential development justified by the evidence and reasonable?
- b) Are the boundaries of the geographical areas (low, medium and high) and site size thresholds for proposed differential residential charging rates, soundly based on development viability evidence?
- c) Is the CIL charge for convenience retail development justified by the evidence and reasonable?
- d) Are the nil-CIL charges for comparison retail and 'all other uses' justified by the evidence?

Issue 4 – Does the evidence demonstrate that the proposed charging rates would not put the overall development of the area at serious risk?

- a) What effect will the residential charging rates have on the delivery of planned housing provision in the district?
- b) What effect will the convenience retail charge have on the delivery of convenience floorspace provision in the district?

23 January 2015