



15th July 2016

Sefton Council
Local Plan Team
Magdalen House
Trinity Road
Bootle
L20 3NJ

Dear Sir/Madam,

REPRESENTATION TO THE SEFTON COUNCIL COMMUNITY INFRASTRUCTURE LEVY – DRAFT CHARGING SCHEDULE

As a planning consultant that is active in the Sefton area, please find below my comments with regards to the aforementioned consultation.

Benchmark Land Values

I would respectfully highlight that details of many of the viability assumptions used in the Economic Viability Study and the Addendum for Apartments are not clearly presented in the document. This limits opportunities for proper scrutiny of the evidence base.

I would therefore be grateful if the Council would consider setting out the viability assumptions used in the viability appraisals in a standalone document or table.

Benchmark Land Values for brownfield sites do not appear to be evident in the either report, although residual land values are given for Strategic Sites in Table 6.1. In many instances the residual land values shown would not be sufficient to cover the existing use values of brownfield land in urban area.

Brownfield Development

Table 5.2 of the Economic Viability Study advises that residential development on brownfield sites cannot support both policy compliant levels of affordable housing (30%) and the Community Infrastructure Levy across the Authority.

The results of our viability testing of hypothetical developments on brownfield sites in the rest of the Borough suggest that, based on the policy requirement of 30% affordable housing, development is not sufficiently viable to support a CIL charge in all areas. To introduce a CIL charge in these cases the Council may need to balance the requirements for affordable housing and consider a reduced amount of affordable housing provision if CIL is taken forward. (Paragraph 5.13)

The emerging Sefton Local Plan still stipulates a requirement for 30% of the total scheme to be provided as affordable housing in *Policy HC1: Affordable and Special Needs Housing*. The proposed



planning obligations regime for Sefton would therefore render the delivery of all residential development on brownfield land to be unviable. This would be contrary to both the requirements of the CIL Regulations and the National Planning policy Framework.

Summary

The evidence base for the proposed CIL Charging schedule demonstrates that the viability of residential development in the urban areas of the Authority is more finely balanced than those of greenfield strategic sites. Whilst it is appreciated that the majority of new residential development in the Authority will come forward on strategic sites, the emerging planning obligations regime should not prejudice the development of sustainable windfall sites in urban areas.

I therefore respectfully request that residential development on previously developed land across the authority is exempt from CIL to better reflect the findings of the evidence base.

Thank you for the opportunity for comment.

Yours faithfully

Chris R. Butt
Associate Director
Tel: [REDACTED]
Email: [REDACTED]