

Our ref: TR/jcw/2199

email: j.woolf@woolfbond.co.uk

23rd December 2014

Planning Policy,
East Dorset District Council,
Furzehill,
Wimborne,
Dorset,
BH21 4HN

BY EMAIL

Dear Sirs,

Statement of Modifications to the Draft CIL Charging Schedules for Christchurch and East Dorset/PBA CIL Levy Statement of Modifications re Strategic Sites and Addendum.

We refer to the above modifications and respond on behalf of our clients Messrs Taylor Wimpey UK Ltd. Our clients have a controlling interest in the proposed Christchurch urban extension comprising land north of Roeshot Hill and wish to ensure that the planning policy framework aimed at securing release of the land is satisfactory, sufficiently flexible and viable.

We are concerned that the timetable for comment on the modifications has been limited to four weeks only, including the Christmas period when many people are away. This limits the opportunity to review properly all of the proposals accordingly. Our comments below represent a holding objection and we reserve the right to add further comment as necessary in January 2015.

We comment firstly on the draft CIL Modifications. We note that Modification SM10 now proposes that residential development on the Roeshot Hill//Christchurch Urban Extension (CN1) is to have a CIL rate of £0 per square metre. This responds to our representations made in summer 2104 and we support this modification.

We refer to modification AM3 that mentions A35 junction improvements will be necessary through S106 contributions. We request that the following additional wording is added under the heading 'Infrastructure and other items to be funded through S106 Obligations; S278 of the Highways Act; other legislation or through planning condition' in respect of A35 improvements.

'to such extent as may directly relate to identified traffic impacts from a respective site'.

These words should equally apply in respect of the commentary within PBA Statement of Modification : Strategic Sites Rev AA Nov 2014 at paragraph 2.11, relating to identified transport requirements; where evidently these measures have not yet been objectively tested.

We also refer to modification AM2 that refers to the need for 'replacement allotment provision' in relation to the development of defined sites, including Roeshot Hill. We acknowledge that the allotments may need to be replaced as part of the Roeshot Hill development scheme but only in the event that the scheme for the site includes provision for their redevelopment. This is subject to discussions between the owners and developers, For example their replacement could instead be dealt with by way of 'on-site' provision elsewhere on the development site. We therefore propose the wording 'replacement' is amended to say 'retain or replace' in respect of the wording under the Infrastructure and other items to be funded through S106 Obligations; S278 of the Highways Act; other legislation or through planning condition' heading.

Subject to the above minor amendments being made, we have no further comments on the CIL Schedule. We would appreciate confirmation that these amendments can be made and once this is received can confirm we would not wish to appear at the Examination. Until this is received we reserve the right to appear.

No doubt you will contact us in the event that you wish to discuss any matter(s) arising.

Secondly we wish to comment more generally upon the PBA CIL Levy Modifications and Addendum. We are concerned that the opportunity in time terms for a full review of the relevant financial data is so limited, albeit we welcome and concur with the conclusion in the PBA report at para 2.1.7 that a zero CIL charge is all that can be justified.

It is quite clear from brief analysis, that the infrastructure costs assumptions on the Roeshot scheme (that the report identifies at £20,000 per dwelling) are already very high notwithstanding that the base research material, including the Whiteleaf work, is now some years out of date; and our concern is that the infrastructure requirements for the scheme could well be even greater.

This position, coupled with what we would consider to be unrealistically low gross land value threshold assumptions; and an as yet uninformed assumption upon net:gross ratios; an apparent failing in properly factor in the related and significant holding interest (that will apply to a ultimate day one land value at the time of a planning consent such to see this major scheme through an inevitably extended development period in the order of 10 years at typical and realistic build rates); together with evidently unjustified assumptions as regards the costs of securing enabling (SANG) land; all leads inevitably to continued concerns in respect of overall viability at a zero rate CIL, even with reduced affordable requirements..

In short our clients welcome the opportunity for a 'clean sheet' non CIL based discussion about S106 and/or S278 costs associated with the scheme, but presently remain very concerned about unrealistic expectations in terms of the potential financial yield for the site.

We look forward to discussing the matter in more detail in due course.

Yours faithfully,

Jeremy C. Woolf MA DipTP MRTPI

Enc.