



Handforth Parish Council

Handforth Youth Centre
Old Road
Handforth
SK9 3AB

06/11/2017

clerk@handforth.org.uk

Community Infrastructure Levy – Draft Charging Schedule Consultation – October 2017

Draft Charging Schedule

Whilst Handforth Parish Council do not object to the introduction of the Community Infrastructure Levy (CIL) by Cheshire East Borough Council, Handforth Parish Council strongly object to the proposed draft charging schedule as presented in its current form.

Handforth Parish Council objects to Local Plan site LPS33 – The North Cheshire Garden Village (NCGV) – rated at zero.

Handforth Parish Council has commissioned an independent viability study to put to the responsible CIL officer at Cheshire East Council, and the Independent Inspector when CIL undergoes examination; which challenges the report produced by Keppie Massie on behalf of CEC as evidence of viability on the NCGV site. (Appendix A)

The report has been completed by GVA Consultancy

This consists of consultancy support to prepare representations to the Draft Cheshire East Community Infrastructure Levy. The response has been prepared by their Planning, Development and Regeneration (PDR) team within GVA, alongside their Valuation business unit.

- Handforth Parish Council does not agree with the assumptions and methodology made by the Keppie Massie report in relation to viability of the NCGV site. As the Keppie Massie report shows a viability study is designed to demonstrate the profitability of a development by comparing the sales revenue with the costs in order to ensure that the developer achieves a sufficient return for profit and risk. There are, therefore, inevitably many input figures many of which are specific to the particular developer, costs which are uncertain due to lack of full information at the date when the viability study is undertaken and some of which are purely subjective - The RICS Guidance does not recognise this.

- The methodology used by Cheshire East Council is inconsistent and applies arbitrary CIL rates across the borough. There is a major discrepancy between the draft CIL charging rate of site LPS34 at £168.00/m² and LPS33 at £0/m² (sites less than 1 mile apart). There is a difference in house prices across Cheshire East (especially between North and South), the Keppie Massie report has generalised these sales prices and produced an anomalous low value in the North of the Borough including Handforth. We would recommend a flat charge across the borough as has been applied in Cheshire West and Chester (which has been uniformly rated at £110 per square metre).
- It is interesting to note that Keppie Massie have conducted the viability studies for Cheshire West and Chester, as well as Cheshire East Council and based on the same methodologies Cheshire West and Chester have applied a uniform CIL charge across the borough, yet Cheshire East have decided not to.
- Balance between funding infrastructure and potential effects on viability. There is a significant infrastructure shortfall in Handforth which will only increase with the scale of development proposed in the local plan. The introduction of a flat rate as described above (and implemented in Cheshire West and Chester) would assist in making up that shortfall. There are very few infrastructure needs identified for Handforth in Cheshire East Councils published Draft Regulation 123 list and whilst these infrastructure needs may not have been identified by CEC, they have been thoroughly identified by the residents of Handforth, these needs have formed a large part of the final draft neighbourhood plan, which has been approved for and is currently undergoing statutory regulation 14 consultation. It is worth iterating that this document has been produced for and on behalf of Handforth Parish council by the Neighbourhood Plan steering group who have extensively consulted residents (with a large volume of evidence to back this up) in their identifying of significant infrastructure shortfall in Handforth (Appendix B).
Note- Also much of the highways and transport infrastructure requirements identified in this neighbourhood plan have been passed on for inclusion in the emerging CEC local transport plan.

Handforth Parish Council ask that full consideration be given to the empirical evidence in the report produced by GVA consultants (Appendix A) challenging the assumptions made in the Keppie Massie report. Also to give full consideration to the infrastructure needs of Handforth which have been identified and included into the final draft neighbourhood plan, currently at statutory regulation 14 consultation (Appendix B)- specifically pages 80 -83.

Yours sincerely

A Comiskey Dawson

Clerk to Handforth Parish Council

Adopted by Handforth Parish Council at the meeting held on 02nd November 2017 – 17/30/5