



Woking Borough Council

Community Infrastructure Levy

**Examination into Draft Charging Schedule – Response to
Examiner’s Preliminary Questions – ID/1**

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Produced by the Planning Policy Team

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**WOKING BOROUGH COUNCIL COMMUNITY INFRASTRUCTURE LEVY (CIL) –
EXAMINATION INTO DRAFT CHARGING SCHEDULE**

RESPONSE TO EXAMINER'S PRELIMINARY QUESTIONS – ID/1

Examiner's question

Natural England's consultation response dated 27 August refers to their comments on the preliminary draft charging schedule dated 2 April 2013. Please provide a copy of that letter.

Council's response

Natural England's comments on the Preliminary Draft Charging Schedule have been sent to the Examiner by post on 20 March 2014. All the representations to the Draft Charging Schedule, including the 2 April 2013 representation from Natural England will be put on the Council's website for public information.

Examiner's question

Is it appropriate to include the Regulation 123 list within the Charging Schedule itself, bearing in mind that is a 'living' document which is likely to be subject to change during the lifetime of the Charging schedule? How are schemes identified in the Regulation 123 list related to the infrastructure assessment?

Council's response

It will be inappropriate to include the Regulation 123 list within the final charging schedule itself. The Community Infrastructure Levy Regulations 2010 (as amended) makes provision for a charging authority to publish the list of infrastructure projects or types of infrastructure that it intends will be, or may be, wholly or partly funded by CIL. This is further clarified by the Community Infrastructure Levy Guidance (April 2013), which states that 'the charging authority should set out at examination a draft list of the projects or types of infrastructure that are to be funded in whole or in part by the levy. It is within this context and other recent Guidance Notes and Regulations that the Regulation 123 list has been published as Appendix C of the Draft Charging Schedule (WBC/CIL/001). Both the CIL Regulations and the CIL Guidance allows for a regular review of the Regulation 123 list and the Council's view is that this is what is likely to happen in practice during the lifetime of the charging schedule. The Council's preference will therefore be for the Regulation 123 list to be a stand-alone published document to allow scope for its regular review. It is acknowledged that the Regulation 123 list is included in the CIL draft charging schedule (May 2013) (WBC/CIL/001). The intention is to bring together the background information to the CIL charging rates in a single document to aid the Examination. In addition, the Council has also submitted and published a stand-alone document that only includes the draft CIL charging rates (WBC/CIL/020) and the approach to calculating how much developers will pay. It is not intended that the Regulation 123 list will be part of the final CIL charging rates document.

The Council has an up to date adopted Core Strategy (WBC/CIL/007) that provides the policy basis for the introduction of CIL. The Core Strategy was examined against the requirements of the National Planning Policy Framework (NPPF) and judged to be NPPF compliant. Policy CS1 – *A spatial strategy for Woking Borough* of the Core Strategy sets out the overall quantum of development that is expected to be delivered across the Borough between 2010 and 2027. An Infrastructure Delivery Plan (IDP) (WBC/CIL/006) has been prepared to identify the necessary infrastructure that will be needed to support the anticipated development proposals of the Core Strategy. The IDP was prepared with significant involvement of the relevant infrastructure providers and has also been scrutinised as part of the evidence to support the Core Strategy at the Core Strategy Examination in 2012. The Council has also published a Schedule of Infrastructure Delivery Requirements (February 2012) (WBC/CIL/019) that clarifies the IDP schemes in detail with specific types of infrastructure that will be needed to support the proposals in the Core Strategy. This document has also been scrutinised at the Core Strategy Examination. Both documents have been used to directly inform the Regulation 123 list. The Regulation 123 list seeks to secure contributions towards transport, education, Thames Basin Heaths Special Protection Areas and open space schemes. It should be noted that CIL contributions will be top-sliced for Suitable Alternative Natural Greenspace (SANG) provision to allow development to proceed. The justification for these is derived from the IDP and the Schedule of Infrastructure Delivery Requirements. The Council has submitted to the Examiner a CIL

Topic Paper on Infrastructure Funding Gap (WBC/CIL/003). This document is also informed by the IDP and the Schedule of Infrastructure Delivery Requirements and it lists the broad infrastructure and their estimated costs with a funding gap that CIL will contribute. The Topic Paper costs the identified infrastructure, the expected other sources of funding and the funding gap to which CIL will help contribute. The Regulation 123 list is also a direct reflection of the broad items in the Topic Paper. It is important to note that the IDP includes a lot more infrastructure items than set out in the Regulation 123 list. However, for the purposes of CIL, at this stage, only four broad infrastructure schemes have been identified on which the Regulation 123 list is based. It is accepted that CIL will not be the panacea to meet the entire cost of infrastructure provision and as such there is a need to prioritise the infrastructure delivery for the purposes of CIL. This is acknowledged in paragraph 6.1 of the Topic Paper on Infrastructure Funding Gap and paragraph 3.27 of the CIL draft charging schedule and it has formed part of the Council's approach in arriving at what it considers to be an appropriate balance at the current stage (for the first charging schedule) between infrastructure needs and viability; for monitoring and future review to inform subsequent charging schedule updates. Future reviews of the Regulation 123 list will consider the need to include other infrastructure schemes in the IDP if they can be justified and will not undermine development viability.

Examiner's question

DSP's Viability Study (VS) is dated January 2013. Has it been updated since then? How has the advice in paragraph 27 of the CIL Guidance been addressed in the VS? Are the scenarios examined in the VS typical of the sites expected to come forward under Core Strategy policy CS10? Is there any material difference between greenfield and brownfield build costs in Woking, and if so how has that been dealt with in the VS?

Council's response

The VS has not been updated and there is nothing unusual in this given the nature of the CIL setting process; inevitably the stages take a significant period overall, including consultations etc., and it is necessary to inform those through setting assumptions and making judgements at a point in time. However the VS work includes a wide range of sensitivity testing, so that for example the effect of increasing (or decreasing) market values for completed development (GDVs (gross development values) – as viewed through the range of Value Levels (VLs) used – on development viability can be seen.

In line with DSP's established comprehensive and robust approach to considering viability, the VS also gives consideration, as an additional indicator only, of the level of the proposed CIL charges (and indeed the wider 'trial rates' tested) when viewed as a proportion (%) of the GDV. The %s are considered to be modest and certainly within appropriate parameters if that is considered an additional measure of the proposals. Examples are noted at Figure 12 (para. 3.9.3, page 70) and Figure 13 which follows in the VS.

Although the study pre-dated the April 13 guidance, it has been carried out in accordance with well-established testing and review principles so that whilst there are aspects that have changed through the latest regulations guidance (February 2014) so far as affect the Council's implementation of CIL (for example in respect to self-builds and property occupation periods), even to the guidance beyond that in place at April 2013 the testing principles have remained the same. It is considered that the assessment remains appropriate and robust, even when viewed in light of subsequent guidance updates.

The Council notes that there is another aspect to consider in respect of the VS timing. This is the fact that whilst the commercial property market has seen some stabilisation and a level of improvement in respect of prime locations and sectors, the housing market has moved ahead considerably. At a broad level notable house price increases have been seen. This effect has proven to be stronger in prime commuter belt areas such as Woking than in many other areas outside central London; and a range of recent and current market forecasts indicate a very strong likelihood of this trend continuing. House prices are forecast to rise a further 20% or more in the next 4 to 5 years, underpinning a significantly improved level of viability in many cases and generally outweighing the effect of increasing costs. A mini-report has been prepared summarising the house price trends that have been influencing the local picture and look set to continue to do so. This shows that even a conservative estimate based on the Land Registry House Prices Index for Surrey (rather than Woking specifically) places prices up by 6 to 7% during 2013. To give a feel for the impact of this on viability, these levels of value increases represent around twice the proportion of sales value that the proposed CIL charging levels represent; in other words since the VS work timing the improvement in values has more than outweighed the level of proposed CIL charging. On a

national basis similar trends are reported – for example by the Halifax (at 7.5% during 2013) and Nationwide (8.4%), the RICS and others. The Woking market is buoyant even when considered in a South East context, and this relative strength has been seen as development has continued at some level through the more challenging market period of recent years.

As set out in the VS (2.2 and Appendix I) the nature of the Council's approach in Core Strategy Policy CS10 has been reflected throughout the VS process from the scenarios, assumptions and the judgements drawn from it and applied appropriately by the Council. A wide range of development types was considered, reflecting a mix of lower density development outside Woking town centre and higher, typically more costly development within it. The scenarios are generic in accordance with the established robust methodology and appropriately representative of the Council's approach in its NPPF compliant Core Strategy that does not allocate specific sites but, appropriately, sets a strategy for broad locations and indicative densities of development. As noted below, in following responses, the Council's preparatory work is underway on its Development Delivery DPD. In due course this may well further inform review for future CIL Charging Schedules in accordance with the normal expected approach and relatively short term expected life of a first Charging Schedule.

The undertaking of the VS including a comprehensive approach to contacting locally active development industry stakeholders, so that support from developers was sought in accordance with DSP's sound approach. As is not unusual, limited information was gathered. There is a range of reasons for this, including the sensitivities and particular interests involved. The assessment process needs to use available information, assess that in the round and move on to make reasonable assumptions in the circumstances; all typical and appropriate for this type of assessment.

Furthermore, the nature of the scenarios reflected those used to inform and support the Core Strategy VS work, in accordance with para 27. of the CIL Guidance referred to (2013). The Core Strategy basis for the scenarios was to use actual examples taken from the Council's exemplar schemes. Those were used by the Council to demonstrate that the indicative levels of density could be achieved without compromising on the design of a scheme. They were confirmed by the Council to provide a good indication of the types of development coming forward.

In terms of greenfield development, the VS included consideration of this as well as brownfield (PDL) through the range of scenarios considered, which included reference to potential general location and site type; with varying dwelling types / mixes, assumed densities, varying build costs, potentially varying land values and the like. However, this is part of the comprehensive information considered by the Council. The consideration of greenfield development is in the context that the only significant greenfield/Green Belt land that will be expected to come forward for development is earmarked between 2022 – 2027. This is clearly emphasised in Policies CS6 and CS12 of the Core Strategy. It is also acknowledged in paragraph 5.3 of the Infrastructure Funding Gap Topic Paper. Overall, in terms of whole Plan delivery relevance, it is considered that the development of Green Belt land will be relevant to future review of the charging schedule rather than of key relevance now; as more detail is developed on the nature of schemes in due course.

Examiner's question

Does the Council have any evidence about the viability of typical local retirement housing (Class C3)?

Council's response

Although there was no specific evidence relating to this type of market housing within the CIL Viability Study, recently the Council's viability advisers have undertaken further appropriate high-level appraisal work to add further detail to the information available to the Council (and others as may be appropriate). The background to and context for this approach, together with the nature of the outcomes, are drawn into the response below.

The Council considers that retirement housing (also referred to as sheltered / age-restricted housing) can be delivered in the Borough based on schemes generally achieving positive viability when CIL is introduced; as is the case with other forms of development within the wide spectrum that makes up the market housing offer. Since 2000, 12 no. elderly person's accommodation schemes have been completed across the Borough (comprising a mix of full new-builds, extensions and conversions. Of this total, 6 no. fall into Use Class C3 and 6 no. are within Use Class C2. Of those C3 schemes 1 no. provided extra-care housing, so that in terms of typical retirement / age-restricted (sheltered housing) there were 190 dwellings provided in the form of self-contained apartments across 5 no. developments over a period of approximately 13 years. If an average annual level of supply view is taken, therefore, this has amounted to approximately 15 retirement dwellings broadly of this type per annum. The attached spreadsheet provides details of these developments. There are no current strong indications to suggest a significant change in this picture.

Policy CS13: *Older people and vulnerable groups* of the Core Strategy provide a positive policy framework for schemes to come forward and the Council will continue to work in partnership with providers to ensure their effective delivery if the need can be justified. The Core Strategy does not set any specific target or requirement for elderly persons' accommodation. It acknowledges the potential need and provides a positive policy framework for its delivery, including the consideration of allocating sites for their development if a need can be justified. The successful delivery of the Core Strategy will not therefore depend on how much elderly person's accommodation is delivered. Generally, on the back of Policy CS21: *Design*, the Council has been encouraging the provision of residential development to be of Lifetime Homes standard to meet the changing needs of the occupier. This will help some people to live independently in their own homes as they grow older.

Based on the above, the Council is of the view that such schemes when needed and justified can be delivered with positive viability; no special treatment should be given to this form of market housing within the CIL charging schedule. In fact the Council is concerned that looking to differentiate this form of housing market could produce other problems through inequity or even state-aid issues. There is a possibility that developers of other particular forms of market housing could then potentially claim merit in the schedule dealing with many different types of variations that will always exist - from one scheme type to another; all are different and this variation is part of the inevitable mix that the selected CIL charging levels are capable of working with as part of the successful overall Core Strategy delivery.

Importantly, this also links to the development viability picture being similar overall for this form of market housing development to that for non age-restricted housing. Retirement / sheltered housing schemes typically have characteristics that support viability positively relative to many other residential schemes (for example premium level sales values as new-builds, reduced scope of external works and usually a more flexible off-site approach to affordable housing requirements in practice). Those characteristics tend to balance with the aspects that work against their viability in relative terms; the non-saleable floor area being the key aspect to bear in mind in the balancing against the positive viability influences.

At the point the CIL Viability Study was prepared and in the follow-up stages, there was no basis to suggest a requirement for reviewing retirement housing as a particular scheme type, given a range of factors that shaped the building up of appropriate available evidence. These included the Council's consultants' previous experience of CIL viability, resulting in 4 no. Examination outcomes and indeed a range of other Authorities' approaches and outcomes where no direct appraisals had been considered necessary and no CIL rates differentiation created.

Viability consultants DSP have 2 further, recent experiences of informing Councils' Charging Schedules, through the Examination process in the Autumn of 2013 and therefore giving an up to date perspective so far as possible and a further opportunity for the consultants to review the arguments, consider the matter and the Inspectors' report findings. At Sevenoaks, where the relevance of housing for the elderly, including retirement housing, was acknowledged by the Council as part of Plan delivery the evidence therefore prepared (specific appraisals run) showed positive viability for such schemes, as it did for wider market housing; underpinned by generally similar sales values to those relevant in Woking and with similar proposed CIL charging levels allowed for. Whilst housing for the elderly, including retirement housing, was not key to the plan delivery overall by any means there, the Council's approach included an acknowledgement that some identified sites could be suitable for housing for the elderly. At West Berkshire the same was found (no justification for differentiation) but in that instance it was not necessary to conduct specific appraisals given the Council's position that such housing was not sufficiently relevant to overall Plan delivery to warrant specific study or, therefore a differential approach. The CIL guidance recognises that it is not necessary to consider potential varying development types exhaustively. Nevertheless, the matter was again considered closely there in the context of retirement housing not being central to the overall Plan delivery. That meant, as in Woking Borough's case, above, the Plan overall would not be prejudiced even if individual schemes were not viable; an accepted premise of CIL. No specific appraisals on retirement housing were necessary to the appropriate, robust approach that supported the approach there.

On assessment of the previous experience from 4 no. complete CIL setting processes and application to Woking Borough's local circumstances (including the non-central relevance to the Plan overall, and the limited occurrence of such schemes to date) specific viability evidence was not considered necessary for retirement housing in light of the CIL guidance. Following further review, on balance it was decided to run some specific appraisals. Whilst DSP's most recent experience suggests that strictly speaking specific evidence is probably still not warranted given the nature of CIL and the rate-setting process, prospective Charging Authorities' approaches to this have varied and this has recently become a theme of some Examinations in DSP's latest experience. The resulting appraisals, prepared on balance in this context, confirm the positive viability scenario outlined above. They show outcomes at

least comparable to those generally expected from other types of market housing located away from the town centre core – in other locations where this type of development would be most likely to come forward if it is pursued locally. The finding, against the need for differentiation, is also consistent with the approach taken by Espom and Ewell Council in Surrey recently (viability work by others), as well as with the CIL proposals of nearby Runnymede and Spelthorne Boroughs (viability assessments by DSP). A summary of the further appraisal prepared for the Council's additional information, with the key assumptions and indicative residual land value (RLV) outcomes visible, can be made available to the Examination process with a brief explanatory note – if appropriate and required - as a separate note.

Examiner's question

Paragraph 87 of the CIL Guidance requires information about how section 106 policies will be varied after CIL is adopted; can this be explained in the case of Woking. How will s.106 operate after CIL is adopted, and have potential CIL Charging rates per dwelling or per development equivalent been compared with current s.106 contributions levels? How has the notional £1,500 per unit s106 post CIL used in the CIL been arrived at?

Council's response

The Council has approved the use CIL as the primary mechanism to secure developer contributions towards infrastructure delivery to support future development on the back of the Core Strategy. It did so mindful of the fact that after the CIL charging schedule comes into force, the use of Section 106 Agreements will be curtailed. After April 2015 there will be a scaling back of the use of Section 106 Agreements through Government legislation, so that the Council expects to work with the new system as effectively as possible in the local circumstances, but has no discretionary power to change the principles that will determine how this is done. Notwithstanding this, the Council expects Section 106 Agreements to continue to play a vital and complementary role to CIL in limited circumstances in helping to bring forward some development proposals in a sustainable manner. The initial expectation of the Council is that this is mostly likely to apply only to larger scale schemes (with the exception of Affordable Housing contribution in accordance with Policy CS12: *Affordable Housing* of the Core Strategy). In accordance with the legislation / CIL Regulations and guidance, the key principles that the Council will apply to guide the use of Section 106 Agreements after CIL is adopted are:

- Section 106 Agreements will only be entered into if they are:
 - Necessary to make the proposed development acceptable in planning terms;
 - Directly related to the development; and
 - Fairly and reasonably related in scale and kind to the development.
- Making sure that there is no overlap in the use of CIL and Section 106 Agreements;
- Limiting the use of pooled Section 106 obligation to no more than 5 separate planning obligations for an item of infrastructure that is not intended to be funded by the CIL levy.

In the context of the above principles, after CIL is adopted, Section 106 Agreements will be restricted to secure the delivery of site-specific infrastructure or mitigation matters that are directly necessary to enable a specific site to come forward for development, and which are not set out in the Regulation 123 list. For information, the Draft Charging Schedule (WBC/CIL/001) includes a draft Regulation 123 list. The list is a clear indication of the specific types of infrastructure that CIL contributions will be used to deliver. Section 106 Agreements can however be secured to deliver any infrastructure items that are not on the list as long as they can be justified in accordance with Regulation 122 of the CIL Regulations (as amended) and within the principles set out above.

The legislation guiding the use of CIL allows scope for the regular review of the Regulation 123 list. However, in doing so the Council will ensure that the reasons for the review are clearly explained and subject to an appropriate level of consultation. Where a change of the list will have significant implications on the viability evidence that supported the charging schedule, the Council will only make the change as part of the review of the charging schedule. This is necessary to demonstrate in a transparent manner the type of infrastructure items that Section 106 Agreements will not be used to deliver.

The Core Strategy does not allocate specific sites for development. In this regard, site specific infrastructure requirements for particular sites will be determined on a case by case basis in accordance with the relevant policies of the Development Plan for the area and in the way that s.106 has operated to date (albeit in a significantly scaled-back way, comparatively). The Council is in the process of preparing its Development Delivery Development Plan Document (DPD). This document will allocate specific sites for various types of uses. The need for any site specific infrastructure that will be necessary to deliver the allocated sites will be considered and clarified as part of this process.

Affordable housing is exempt from the CIL charge and will continue to be secured in the established way through Section 106 after CIL is adopted. The provision of this, its mix and tenure etc. will continue to be the subject of site-specific consideration so far as necessary; informed by the Council's policies and guidance and continued to be operated through its practical approach to delivery. It is important to note, however, that the implications of the full policy levels of affordable housing have been considered comprehensively in the viability and CIL rates setting work.

It is re-emphasised that the Council has begun the preparation of its Development Delivery DPD that will allocate specific sites for development and consider any site-specific infrastructure or mitigation that might be necessary to ensure their delivery. Combined with the affordable housing approach, the levels at which CIL charging is proposed are appropriate in terms of enabling viability and delivery flexibility, i.e. accommodating additional scheme costs or unforeseen aspects by not setting CIL at potentially too high levels. If in exceptional circumstances any of the infrastructure schemes identified in the Regulation 123 list is also identified as necessary to ensure the delivery of a particular allocated site, only the difference in cost between what will be secured under CIL and what will be necessary to enable the site to come forward will be secured under Section 106 Agreement. In the unlikely event of this occurring, the Council will avoid double counting and ensure that the additional cost does not compromise the viability of the development. Whilst CIL is a fixed element of development costs, there will continue to be flexibility in the use of s.106 in order to deliver appropriate scheme measures whilst maintaining an appropriate level of viability; through the type of viability discussion that already take place where needed. At this stage, the Council does not foresee any such exceptional circumstances but it has proposed an amendment to Appendix C of the Draft Charging Schedule to allow scope to deal with such instances if any were to happen during the lifetime of the charging schedule.

An open book approach to viability will apply in negotiating Section 106 Agreements, as is operated currently.

Paragraphs 5.14 and 5.15 of the draft CIL charging schedule provide information on the future use of Section 106. The above expands that with further detail and clarification. After the charging schedule is adopted, the Council will publish a *Guidance Note* setting out clearly how Section 106 will be used after the adoption of CIL and explaining the relationships between the two. This will ensure transparency in their application.

The Core strategy, in particular, Policy CS16: *Infrastructure delivery* and Section 6: *Implementation and monitoring of the Core Strategy* provides the planning policy context for securing developer contributions towards infrastructure provision. Planning obligations based on negotiation is presently the means that is used to secure developer contributions. However, the Core Strategy also acknowledges that CIL will be the primary means for securing developer contributions when the CIL charging schedule is adopted. Because the two approaches are different, it is difficult to settle on a direct, logical and robust basis for comparison. For example, CIL contributions will be charged per square metre whilst the existing Section 106 Agreements are negotiated by number and in some cases type of dwellings (in the form of number of bedrooms or additional number of people generated by the development). However, using as an indicative basis the total amount of money that has been secured through Section 106 Agreements under the current approach and what could be secured over a similar time period when CIL is introduced, some form of reasonable comparison can be made.

Table 6: *Developer contributions agreed and received between 2007 and 2013* of the draft charging schedule provides an update of developer contributions agreed and received between 2007 and 2013 (a period of 5 years). During this period the total amount of developer contributions agreed including Affordable Housing financial contributions was £8,986,394. Without the Affordable Housing financial contribution, this was £6,973,774. The annual average agreed over this period was therefore £1,797,279 or £1,394,755 respectively. The total income expected to be generated by CIL over 10 years is £13,900,175. The equivalent for five years for comparison purposes will be £6,950,088. The annual average for the five year period will be £1,390,018 (excluding Affordable Housing financial contribution). It is clear from the analysis that these figures compare reasonably well and that the amount of Section 106 contributions agreed over the five year period is almost the same as could be secure under CIL within a similar time period. From the Council's point of view this demonstrates that the draft CIL charging schedule when adopted will not undermine development viability relative to the recent functioning of s.106 and that the approach and selected rates strike a reasonable balance between the funding of infrastructure through CIL and maintaining development viability. Above all, the Council is of the view that the introduction of CIL will not compromise the comprehensive delivery of the Core Strategy; it will continue to support it.

The £1,500 per dwelling (applied to all dwellings) VS assumption effectively represents a contingency sum to allow for potential small scale s.106 in comparison with current levels, alongside the CIL charges. It should be noted that this is not an expected sum and there are no specific pointers to this figure, but an appraisal allowance. This is the approach typically used and in this case this assumption has been set at a slightly higher level than in much of in DSP's wider VS work given that the most significant tool in most cases moving forward will be CIL. However in this instance the £1,500 was considered to be an appropriate assumption on review with the Council based on the current and projected approach to this. The Council notes that this assumption was formed alongside allowances also made in

respect of SPA mitigation related costs (see the following question and response) given that in the early stages VS discussions with the Council it was felt appropriate to make prudent assumptions with additional contingency scope, given that discussions were being held as to how the challenging matter of the SPA would be dealt with in respect of the working of s.106 and CIL together. The approach that was settled-on if anything builds in more cost than may be needed, however this is considered sound and adds to confidence levels in the approach and the proposed CIL charging rates, given the mix of development involved.

Examiners question

What is the relationship between the requirements in Policy CS8 of the Core Strategy, which requires payment towards SANGs and SAMM, and CIL which will be used to provide SANGs? NB the Viability Study appears to have assumed (paragraph 2.6.9) that this will continue to be paid – is that correct?

Council's response

The Council will use CIL income to mitigate the impacts of development on the SPA. Policy CS8: *Thames Basin Heaths Special Protection Areas (SPA)* of the Core Strategy provides the policy basis for securing developer contributions towards mitigating development impacts on the SPA. Natural England has confirmed that the policy provides sufficient hook for the provision of Suitable Alternative Natural Greenspace (SANGs) when CIL is adopted. The Council accepts that SPA mitigation is obligatory under the European Directive and this will be the case when CIL is adopted. The provision of SANGs needed to support housing growth during the life time of the charging schedule has been identified in the CIL draft charging schedule, the CIL Infrastructure Funding Gap Topic Paper, the IDP and the Regulation 123 list as a type of infrastructure that CIL money will contribute to deliver.

Paragraph 5.13 of the draft charging schedule demonstrates that sufficient CIL income will be secured to meet the cost of SPA mitigation. The Council's approach will be to top slice the CIL contributions to mitigate the impacts of development on the SPA – as noted by the VS was the expectation at that point; para. 2.6.11) and s.106 will continue to support the Strategic Access Management and Monitoring (SAMM) costs. It is important to note that the Council has sufficient existing and on-going proposed SANGs capacity to meet development needs over the entire period of the Core Strategy. Natural England did not raise any specific objection to the draft charging schedule and the Council has invited them to the CIL Examination to confirm their position if they wish to do so.

The Council and viability consultants decided to take a prudent approach to the VS assumptions, allowing additional cost compared with the potential actual cost outcomes, given that at the time there were uncertainties around how the details would settle on this. As above, the additional contingency, based on similar principles to the notional allowance of £3,500/dwelling also made for renewable energy / CHP connection or similar. Again Appendix I of the VS summarises the collection of assumptions made.

App No	SAO DESCRIPTION	PAO DESCRIPTION	STREET DESCRIPTION	LOCALITY DESCRIPTION	POSTCODE	Description	Decision Date	Expiry Date	Status	USE CLASS
1999/0495	LAND ADJACENT TO	THE SOVEREIGNS PUBLIC HOUSE	GUILDFORD ROAD			ERECT OF 53 RETIREMENT APARTMENTS, WARDENS FLAT & 6 AFFORDABLE APARTMENTS (DUPLICATE APPLIC. 99/510)	04/08/2000	04/08/2005	COMPLETED	C3
1999/0894		BERNARD SUNLEY NURSING HOME	COLLEGE ROAD			DEM OF EX HOME & 20-22 COLLEGE ROAD AND ERECT OF 2 STOREY RESID NURSING HOME	19/11/1999	19/11/2004	COMPLETED	C2
2001/1100		AVENS COURT	BROOMCROFT DRIVE	PYRFORD		ERECT OF SIDE EXT TO PROVIDE AN ADDITIONAL 7 BEDROOMS TO EX RESID CARE HOME	01/03/2002	01/03/2007	COMPLETED	C2
2003/1021	ALMOND VILLA NURSING HOME	31-33	BROADWAY	KNAPHILL		COU TO A (LEGALISATION OF) CARE HOME & EXTENSIONS	23/10/2003	23/10/2008	EXPIRED	C2
2003/1043		83-95	HIGH ROAD	BYFLEET		DEM OF EXISTING BUILDINGS & ERECTION OF 24 RETIREMENT APARTMENTS WITH BASEMENT PARKING	29/03/2004	29/03/2009	COMPLETED	C3
2005/0358		26	ST JOHNS ROAD			RETENTION OF RESIDENTIAL CARE HOME	19/05/2005	19/05/2010	COMPLETED	C2
2005/0483		18-28	OYSTER LANE	BYFLEET		REDEVELOPMENT TO FORM 50 APTS FOR ELDERLY (EXTRA CARE NOT AFF HSG)	05/07/2005	05/07/2010	COMPLETED	C3
2005/1170		FORMER ASTRA SPORTS CLUB	KINGS HEAD LANE	BYFLEET		VARN OF PLAN CONSENT 2005/92 TO INCREASE NUMBER OF DWELLINGS FROM 4 TO 5	06/07/2006	06/07/2010	COMPLETED	C2
2005/1297	LOAMPITS FARM	99	WESTFIELD ROAD	WESTFIELD		DEM OF EX BUILDINGS & ERECT OF 46 SHELTERED HOUSING APARTMENTS	10/07/2006	10/07/2011	COMPLETED	C3
2006/0198		COMBE HOUSE	CASTLE ROAD			CHANGE OF USE FROM DWELLING HOUSE TO RESID CARE HOME	11/04/2006	11/04/2011	EXPIRED	C2
2006/1092	ALMOND VILLA RESIDENTIAL HOME	31-33	BROADWAY	KNAPHILL		DEM EXISTING CARE HOME + EREC NEW CARE HOME	30/01/2007	30/01/2010	EXPIRED	C2
2006/1124		55-59	WALTON ROAD			EREC 21 AGE RESTRICTED APARTMENTS (17 X 1BED + 4X 2BED)	19/01/2007	19/01/2010	COMPLETED	C3
2007/0167		BEAUFORT HOUSE	CHOBHAM ROAD	KNAPHILL		EXT OF PRIVATE NURSING HOME TO FORM 1 EXTRA BEDROOM, OFFICE + UTILITY ROOM	02/05/2007	02/05/2010	EXPIRED	C2
2007/0792		ALPHA HOSPITALS OAK TREE CLINIC	REDDING WAY	KNAPHILL		EREC 2 STOREY EXTENSION TO PROVIDE ADDITIONAL SECURE ACCOMMODATION	15/11/2007	15/11/2010	EXPIRED	C2
2007/0814		HORSELL LODGE	KETTLEWELL HILL	HORSELL		2 STOREY EXT TO PROVIDE 10 FURTHER BEDROOMS + NEW CONSERVATORY	21/08/2007	21/08/2010	EXPIRED	C2
2008/0094		GRACE GROOM HOUSE	ORIENTAL ROAD			DEM EAST + WEST WING OF HOUSE + EREC 17 BED RESIDENTIAL CARE HOME + ANCILLARY ACCOM	02/07/2008	02/07/2011	COMPLETED	C2
2008/1304		GREYS RESIDENTIAL HOME	HOOK HEATH ROAD	HOOK HEATH		1ST FLR SIDE EXT TO PROVIDE ADDITIONAL ACCOMMODATION	28/01/2009	28/01/2012	EXPIRED	C2
2008/1329	BEECH TREE HOUSE	11	KIRBY ROAD	HORSELL		CHU FROM C3 (RESID) TO C2 (CARE HOME FOR ADULTS WITH LEARNING DISABILITIES + EREC OF REAR EXT	02/06/2009	02/06/2012	EXPIRED	C2
2010/0450		51-55	MAYBURY ROAD		GU21 5JA	REDEVELOPMENT OF EXISTING BUILDINGS TO FORM 46 SHELTERED APARTMENTS FOR THE ELDERLY	27/04/2011	26/04/2014	COMPLETED	C3
2010/0452		WEST HALL	PARVIS ROAD	WEST BYFLEET	KT14 6EY	RDV OF SITE FOR 117 BED CARE HOME INCL REFURB OF EXISTING MANOR HOUSE (AMENDMENT TO 2008/1141 TO CREATE ADDITIONAL 18 BEDS)	20/08/2010	20/08/2013	COMPLETED	C2
2010/0649	0	HORSELL LODGE	KETTLEWELL HILL	HORSELL	GU21 4JA	EXTENSION TO TIME LIMIT TO IMPLEMENT PP 2007/0814 FOR 2 STOREY EXT TO PROVIDE 10 FURTHER BEDROOMS + NEW CONSERVATORY	02/09/2010	02/09/2013	EXPIRED	C2
2012/0017		ROSE LODGE	BARTON CLOSE	KNAPHILL	GU21 2DU	EXTENSION OF TIME TO IMPLEMENT PLAN/2008/1256 FOR REDEVELOPMENT TO PROVIDE 24 BED CARE HOME	18/06/2012	17/06/2015	EXPIRED	C2
2013/0991		ROSE LODGE	BARTON CLOSE	KNAPHILL	GU21 2DU	ALTERATIONS FOR PLAN/2012/0770 FOR THE ERECTION OF A 30NO STOREY RESIDENTIAL CARE HOME (C2)	10/01/2014	10/01/2017	APPROVED	C2

Schemes overview - planning permissions in Woking since 2000:

STATUS	C2	C3	TOTAL
COMPLETED	6	6	12
EXPIRED	10	0	10
APPROVED and OUTSTANDING	1	0	1

Schemes

DSP added summary notes / shading:

Typical sheltered/retirement housing (TBC)

190 units across 5 schemes

Most recent scheme permitted 2011

viewed over 13 years averages at approx. 15 units/yr overall.

Any current applications / known potential proposals? TBC

Extra care within C3 bracket - relevance to CIL points TBC

50 units in 1 scheme

Only scheme of this type permitted in 2005