

CIL Draft Charging Schedule Response Form 2015

For Official Use Only

Ref:

Rep. Ref.

Please use this form if you wish to support or object to the Community Infrastructure Levy – Draft Charging Schedule

If you are commenting on multiple sections of the document you will need to complete a separate copy of Part B of this form for each representation.

This form may be photocopied or, alternatively, extra forms can be obtained from the Council's offices or places where the plan has been made available (see back page). You can also respond online using the LDP Consultation System, visit: www.warwickdc.gov.uk/planning

Part A - Personal Details

	1. Personal Details	2. Agent's Details (if applicable)
Title		Mr
First Name		Nick
Last Name		Thompson
Job Title (where relevant)		Senior Director
Organisation (where relevant)		Nathaniel Lichfield & Partners
Address Line 1		14 Regent's Wharf
Address Line 2		All Saints Street
Address Line 3		London
Address Line 4		
Postcode		N1 9RL
Telephone number		020 7837 4477
Email address		nthompson@nlplanning.com
Would you like to be made aware of future updates on the CIL?		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
About You: Gender		
Ethnic Origin		
Age	<input type="checkbox"/> Under 16 <input type="checkbox"/> 16 - 24 <input type="checkbox"/> 25 - 34 <input type="checkbox"/> 35 - 44	
	<input type="checkbox"/> 45 - 54 <input type="checkbox"/> 55 - 64 <input type="checkbox"/> 65+	
Notifications		
Please specify whether you wish to be notified of any of the following:		
1. Submission of the Draft Charging Schedule for examination	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
2. Examiner's Report	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	3. Council approval of Charging Schedule <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Part B - Commenting on the CIL Draft Charging Schedule

If you are commenting on multiple sections of the document you will need to complete a separate sheet for each representation

Sheet of

Which part of the document are you responding to?

Hotel Charging Rate

Paragraph number / Heading / Subheading (if relevant)

Table 3

Map (e.g. Proposed Development Sites – District Wide)

What is the nature of your representation?

Support



Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

As per our representation letter submitted to the preliminary draft Charging Schedule Scheme June 2013, we continue to have concerns with regards to the proposed figure of £80 per square metre. The Council's response to the representation provided in Appendix 7 to the Council meeting on the 28th January 2015 stated

"Not all scenarios can be specifically modelled. The viability study seeks to ensure that overall viability will not be undermined through CIL. Flexibility has therefore been brought into the Draft Charging Schedule by setting rates substantially below the maximum potential".

The CIL rate appears to have been arbitrarily reduced from £100 to £80 per sq. m. Given that only one example has been examined, the CIL Schedule could set a threshold of a minimum number of rooms to which the charge applies. The hotel that was used as the basis of the change has 130 rooms and this could be the threshold (or a similar number). This would then avoid the cost burden on smaller schemes (in potentially more sensitive locations as described in our representations, June 2013) that could make them unviable. If a blanket charge is to apply, appropriate evidence needs to be produced to support the proposed charge.

On this basis, our comments submitted on the document previously still stand and are set out again below in italics for ease of reference.

The 'evidence' used to arrive at this figure appears to be based on one project (The Waterways, in Stratford). Using one example is inadequate as a basis to assess CIL.

There are further reasons to question whether this is an adequate "benchmark".

- 1 The Waterways hotel has been developed adjacent to a canal, but in the midst of a relatively low quality environment, dominated by single-storey industrial and retail units. Whilst the hotel is relatively 'attractive', the materials, detailing and uniformity are relatively simple. An hotel in the towns of Warwick or Leamington may need to be of substantially higher quality, especially if the site is within a Conservation Area or the setting of listed buildings. This will add to the costs, potentially both the base construction and external works percentage. These would increase in comparison with those set out in the para. 4.40.1 of BNP Paribas Real Estate Report Viability Study, June 2013.*

Continues on following page...

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Part B - Commenting on the CIL Draft Charging Schedule

Sheet 2 of 2.

- 2 *Scale, the single example quoted has 130 rooms. Constructing a building of this size will benefit from 'economies of scale'. However, many sites in Warwick and Leamington are relatively small and may not be able to accommodate a development with that number of rooms. Accordingly, the costs, per room, can increase and therefore, affect viability.*
- 3 *The worked example makes an assumption that some floorspace is existing. The refurbishment cost is given as £50 per square foot. It is unclear what scope of refurbishment is assumed and whether this would be adequate if a listed building is the subject of the refurbishment. Given the substantial number of listed buildings in Warwick the extraordinary costs of such projects should be considered.*
- 4 *Allied to point 3 is the issue of 'enabling development'. An hotel development may be necessary to generate funds for the refurbishment/maintenance of 'heritage assets'. The CIL as currently proposed may undermine a project's viability and, if it fails to materialise, the funds will not become available to spend on maintaining a heritage asset(s).*

Overall, we consider that a more detailed analysis is required before setting any CIL charge for hotels. We would welcome the opportunity to discuss the situation associated with hotel development with you in further detail.

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Sheet of

CIL Examination : Right to be Heard

Do you wish to be heard by the Examiner at the examination?

Yes

No

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Guidance on Making Representations

- Please use this response form as it will help the Council to keep accurate and consistent records of all the comments on the Plan, alternatively complete online at www.warwickdc.gov.uk/planning
- If you wish to make comments on more than one aspect of the Plan, please use a separate copy of Part B of this form for each
- You may withdraw your objection at any time by writing to Warwick District Council, address below
- It is important that you include your name and address as anonymous forms cannot be accepted. If your address details change, please inform us in writing
- All forms should be received by 4.45pm on Friday 10 April 2015
- Copies of all the objections and supporting representations will be made available for others to see at the Council's offices at Riverside House and online via the Council's e-consultation system. Please note that all comments on the Local Plan are in the public domain and the Council cannot accept confidential objections. The information will be held on a database and used to assist with the preparation of planning policy documents and with consideration of planning applications in accordance with the Data Protection Act 1998
- Please return this form to: Development Policy Manager, Development Services, Warwick District Council, Riverside House, Milverton Hill, Leamington Spa, CV32 5QH or
email: newlocalplan@warwickdc.gov.uk